TSD File Inventory Index

Date: <u>December 5,200</u>0

Initial: Myleneral

acility Name: LTU Ltc. Con	Aur	y, Inc. (Cleullank Worls)	
acility Identification Number: 0HD 004	U 2/8	y, Inc. (Cleullark Cooks) 473	
1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status	/	.1 Correspondence	
.1 Correspondence	ľvl	.2 All Other Permitting Documents (Not Part of the ARA)	
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.4 Financial Insurance (Sudden, Non Sudden)	[/]	.1 Land Disposal Restriction Notifications	
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Total -10

. RFI QAPP		
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93 STC 23 AMII: 47

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

V.

LTV STEEL COMPANY, INC.

Defendant.

1:98 CV 3012

Civil Action No.

JUDGE O'MALLEY

MAN TO THE PERSON

COMPLAINT

The United States of America, by the authority of the Attorney General and through its undersigned attorneys, acting at the request of and on behalf of the Administrator of the United States Environmental Protection Agency ("USEPA"), alleges as follows:

I. NATURE OF ACTION

1. This is a civil action against LTV Steel Company ("LTV") to obtain injunctive relief and assessment of civil penalties for multiple violations of the Clean Air Act ("CAA"), 42 U.S.C. §§ 7401 et seq., at LTV's steel manufacturing facility in Cleveland, Ohio. The complaint also alleges violations of the Clean Water Act ("CWA"), 33 U.S. §§ 1311 et seq., and the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C.

§§ 6901 et seq., at LTV's coke manufacturing facility in Warren, Ohio.

II. JURISDICTION AND VENUE

- 2. This Court has jurisdiction over the defendant and the subject matter of this action pursuant to Section 113(b) of the CAA, 42 U.S.C. § 7413(b), Section 309(b) and (d) of the CWA, 33 U.S.C. § 1319(b) and (d), Section 3008(a)(1) of RCRA, 42 U.S.C. § 6928(a)(1), and 28 U.S.C. §§ 1331, 1345 and 1355.
- 3. Venue is proper in this district pursuant to Section 113(b) of the CAA, 42 U.S.C. § 7413(b), Section 309(b) of the CWA, 33 U.S.C. § 1319(b), Section 3008(a)(1) of RCRA, 42 U.S.C. § 6928(a)(1), and 28 U.S.C. §§ 1391 and 1395, because LTV is located in and is doing business in this district and the violations alleged occurred in this district.

III. <u>NOTICE</u>

- 4. Pursuant to Section 113(a) of the CAA, 42 U.S.C. § 7413(a), LTV and the State of Ohio were notified of the violations of the Ohio State Implementation Plan alleged in this complaint more than 30 days prior to its filing.
- 5. Pursuant to Section 113(b) of the CAA, 42 U.S.C. § 7413(b), Section 309(b) of the CWA, 33 U.S.C. § 1319(b), and Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2), notice of the commencement of this action has been given to the Ohio Environmental Protection Agency ("OEPA").

IV. DEFENDANT

6. LTV is a New Jersey corporation which is qualified to do business in Ohio and maintains corporate offices in Cleveland. LTV operates two steel manufacturing facilities -- the Cleveland Works and the Indiana Harbor Works in East Chicago,

Indiana — a tin mill in Aliquippa, Pennsylvania, a finishing plant in Hennepin, Illinois, and coke production and by-product recovery facilities in Warren, Ohio and Chicago. This complaint alleges CAA violations at LTV's steel manufacturing facility in Cleveland (the "Cleveland Works"), which is located at 3100 East 45th Street in Cleveland, Cuyahoga County, Ohio, and CWA and RCRA violations at its coke manufacturing facility located at 2234 Main Avenue, S.W., in Warren, Trumbull County, Ohio.

7. LTV is a "person" within the meaning of Section 302(e) of the CAA, 42 U.S.C. § 7602(e), Section 502(5) of the CWA, 33 U.S.C. § 1362(5), and Section 1004(15) of RCRA, 42 U.S.C. § 6901(15).

V. STATUTORY AND REGULATORY FRAMEWORK

A. The Clean Air Act

- 8. The Clean Air Act establishes a regulatory scheme designed to protect and enhance the quality of the nation's air so as to promote the public health and welfare and the productive capacity of its population. Section 101(b)(1) of the CAA, 42 U.S.C. § 7401(b)(1).
- 9. Section 108(a) of the CAA, 42 U.S.C. § 7408(a), requires USEPA to establish a list of pollutants which cause or tentribute significantly to air pollution which may reasonably be anticipated to endanger public health or welfare and which are emitted from various mobile or stationary sources.
- 10. Section 109(a) of the CAA, 42 U.S.C. § 7409(a), requires USEPA to publish and maintain National Ambient Air Quality Standards ("NAAQS") for certain air pollutants. The

NAAQS promulgated by USEPA pursuant to this provision are set forth in 40 C.F.R. Part 50.

- 11. Particulate matter ("PM") and sulfur dioxide (" SO_2 "), among others, are "air pollutants" within the meaning of Sections 108 and 302 of the CAA, 42 U.S.C. §§ 7408 and 7602.
- 12. Pursuant to Section 109(a) and (b) of the CAA, 42 U.S.C. § 7409(a) and (b), USEPA has promulgated regulations establishing NAAQS for PM and SO₂, which are codified at 40 C.F.R. §§ 50.4 through 50.6.
- 13. Section 110 of the CAA, 42 U.S.C. § 7410, requires each State to adopt, and submit to USEPA for approval, a State Implementation Plan ("SIP") which provides for implementation, maintenance and enforcement of NAAQS established under Section 109 of the Act within the State.
- 14. Pursuant to Section 110 of the CAA, 42 U.S.C. § 7410, the State of Ohio has adopted and submitted to USEPA various regulations which have been approved by USEPA and which, taken together, constitute the SIP for the State. See 40 C.F.R. Part 52, Subpart KK.
- 15. The Administrator of USEPA approved Ohio Pollution Control Board ("OPCB") Rule AP-3-07(A) as part of the Ohio SIP, effective April 15, 1974. 39 Fed. Reg. 13539 (April 15, 1974) OPCB Rule AP-3-07(A) required that visible emissions from any source not exceed 20 percent opacity except for up to a three-minute period in any 60 minute time period, provided that emissions during such period not exceed 60 percent opacity.
- 16. The Administrator of USEPA approved Ohio Administrative Code ("OAC") Rule 3745-17-07 as part of the SIP for the State of Ohio, effective June 27, 1994. 59 Fed. Reg. 27464 (May

- 17. OAC Rule 3745-17-07(B)(3) requires that visible emissions of fugitive dust from blast furnace cast houses shall not exceed 20 percent opacity as a six minute average.
- 18. The Administrator of USEPA approved OAC Rule 3745-31-02 as part of the Ohio SIP, effective October 23, 1980. 45
 Fed. Reg. 72119 (Oct. 31, 1980). OAC Rule 3745-31-02 prohibits the installation or modification of an air contaminant source without first obtaining a permit to install from OEPA. OAC Rule 3745-31-05(C), which was conditionally approved by USEPA on October 31, 1980 as part of the Ohio SIP, authorizes the Director OF OEPA to include special terms and conditions in such permits.
- 19. Pursuant to Section 113(a) and (b) of the CAA, 42 U.S.C. § 7413(a) and (b), SIP requirements that have been approved by USEPA are federally enforceable.
- 20. The Administrator of USEPA has not approved SiP provisions dealing with emission limits for SO₂ in certain counties in Ohio. The Administrator has promulgated a federal SO₂ limit for sources located in Cuyahoga County, Ohio, among other places. The federal implementation plan limit for SO₂ for LiV's facility in Cuyahoga County is codified at 40 C.F.R. \$ 52.1881(b)(15)(xi).
- 21. Section 113(b) of the CAA, 42 U.S.C. § 7413(b), authorizes the United States to commence a civil action for

injunctive relief and assessment of civil penalties whenever a person has violated or is in violation of any requirement or prohibition in the CAA or in any implementation plan (State or federal) or permit. Pursuant to Section 113(b), persons who violate the CAA or the applicable implementation plan or permit are subject to civil penalties of up to \$25,000 per day for each violation occurring prior to January 31, 1997. Pursuant to Pub. L. 104-134 and 61 Fed. Reg. 69364 (Dec. 31, 1996), civil penalties of up to \$27,500 per day may be assessed for each violation occurring on or after January 31, 1997.

B. The Clean Water Act

- 22. The objective of the Clean Water Act is to restore and maintain the chemical, physical and biological integrity of the waters of the United States. Section 101(a) of the CWA, 33 U.S.C. § 1251(a).
- 23. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants from a point source into mayigable waters of the United States by any person except, among other things, in compliance with the terms and conditions of a Mational Pollutant Discharge Elimination System ("NPDES") permit is sued by USEPA or an authorized State pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.
- 24. Section 502(6) of the CWA, 33 U.S.C. § 1362(6), efines "pollutant" to mean "dredged soil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, themical wastes, biological materials, radioactive materials, eat, wrecked or discarded equipment, rock, sand, cellar dirt and naustrial, municipal, and agricultural waste discharged into ager."

- 25. Section 502(14) of the CWA, 33 U.S.C. § 1362(14) defines "point source" as "any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, from which pollutants are or may be discharged."
- 26. Pursuant to Section 402 of the CWA, 33 U.S.C. S 1342, the State of Ohio is authorized by the Administrator of USEPA to administer the NPDES permit program for discharges into navigable waters within its jurisdiction. The OEPA received authorization to administer the NPDES permit program in the State effective January 1, 1975.
- 27. Pursuant to Section 309(b) and (d) of the CWA, 33 U.S.C. § 1319(b) and (d), the United States may commence a civil action for injunctive relief and assessment of civil penalties not to exceed \$25,000 per day for each violation of Sections 301 and 308 of the CWA occurring prior to January 31, 1997, including discharges of pollutants without or not in compliance with the terms and conditions of an applicable NPDES permit. Pursuant to Pub. L. 104-134 and 61 Fed. Reg. 69364 (Dec. 31, 1996), civil penalties of up to \$27,500 per day for each violation may be assessed for violations occurring on or after January 31, 1997.
 - C. The Resource Conservation and Recovery Act
- 28. The Resource Conservation and Recovery Act establishes a comprehensive scheme for management of hazardous wastes, from the initial generation of such wastes until their final disposal. Regulations promulgated pursuant to RCRA apply

to generators of hazardous waste, as well as to owners and operators of facilities that treat, store or dispose of hazardous waste ("TSD" facilities). The federal regulations implementing RCRA are codified at 40 C.F.R. Part 260 et seg.

- 29. Under Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), and 40 C.F.R. Part 271, a State may apply for and receive authorization to enforce its own hazardous waste management programs in place of the federal program, provided the State requirements are consistent with and equivalent to the federal program. To the extent that certain State programs are authorized by the Administrator pursuant to RCRA Section 3006(b), the State RCRA program is effective in lieu of the federal program.
- 30. USEPA has authorized Ohio to administer various aspects of the hazardous waste management program within the State. The State regulations implementing Ohio's authorized RCRA program are codified in various parts of Chapter 3745 of the Ohio Revised Code ("ORC").
- 31. ORC Rule 3745-52-34(A) allows generators of hazardous waste to store such waste for less than 90 days without a TSD permit, provided that the waste is placed in a container or tank and the generator complies with other requirements, including but not limited to provisions in OAC Rules 3745-66-70 through 3745-66-77, which apply to containers, or OAC Rules 3745-66-90 through 3745-66-992, which apply to tanks.
- 32. OAC Rule 3745-52-34(b) provides that a generator who accumulates hazardous waste for more than 90 days is an operator of a storage facility subject to TSD facility requirements.

- 33. Pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2), the United States, upon notification to the State, is authorized to enforce the regulations which comprise the federally authorized Ohio RCRA program.
- 34. Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), provides that the Administrator of USEPA may commence a civil action in district court for appropriate relief, including injunctive relief, when any person has violated or is in violation of any requirement of RCRA, including provisions of a federally authorized State program.
- 35. Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), provides that any person who violates a requirement of RCRA, including provisions of a federally authorized State program, shall be liable for a civil penalty of up to \$25,000 per day for each violation occurring before January 31, 1997. Pursuant to Pub. L. 104-134 and 61 Fed. Reg. 69364 (Dec. 31, 1996), civil penalties of up to \$27,500 per day may be assessed for violations occurring on or after January 31, 1997.

VI. GENERAL ALLEGATIONS

- 36. LTV's Cleveland Works facility contains, among ther emission sources, the C-1 blast furnace, the C-5 blast firnace, the C-6 blast furnace, the No. 1 basic oxygen furnace (BOF") and boiler 34.
- 37. LTV's Cleveland Works facility is or was subject to the Ohio SIP provisions governing emissions from stationary sources, including, without limitation, Ohio Pollution Control Board ("OPCB") Rule AP-3-07 and OAC Rules 3745-17-07(A)(1) and (B)(1) and (3).
 - 38. On January 24, 1991, OEPA issued a permit to

install ("PTI") to LTV for modification of the C-5 blast furnace at the Cleveland Works facility. This PTI includes a 15 percent opacity limit for cast house emissions, with the exception of the tap hole drilling or plugging operation or the oxygen lancing operation, for which there is a 20 percent opacity limit.

- 39. LTV's Cleveland Works facility is subject to the federal emission limits for SO₂ in 40 C.F.R. § 52.1881(b) (15)(xi)(A). This provision limits Boiler 34 and the C-1 blast furnace stove at the Cleveland Works facility to a maximum of 0.024 pounds of sulfur dioxide for each million British Thermal Unit ("mmBTU") of actual heat input.
- 40. LTV's Warren, Ohio coke manufacturing facility is authorized to discharge pollutants through, among others, outfall 14, to the Mahoning River pursuant to NPDES Permit No. OH0011274, which was issued by OEPA on September 27, 1996 with a November 1, 1996 effective date (the "1996 Permit"). A copy of this Permit is attached hereto as Exhibit B and is part of this complaint.

 LTV's previous NPDES permit for the Warren facility was issued on April 30, 1990 (the "1990 Permit") and remained in effect until the effective date of the 1996 Permit.
- 41. The Mahoning River is a "navigable water" as that term is defined in Section 502(7) of the CWA, 33 U.S.C. \$ 1362(7).

FIRST CLAIM FOR RELIEF

Cleveland Works: Opacity Violations at the C-5 Blast Furnace

- 42. The allegations in paragraphs 1 through 41 are restated here by reference.
 - 43. On various occasions from at least September

through October 6, 1995, LTV caused or allowed emissions of particulate matter with an opacity greater than 20 percent, as a six-minute average, to be released into the atmosphere from the C-5 blast furnace (top) at its Cleveland Works facility, in violation of Ohio SIP Rule 3745-17-07(B)(1).

- to the present time, LTV caused or allowed emissions of particulate matter with an opacity greater than 15 percent to be released into the atmosphere from the C-5 blast furnace cast house during six minute periods that did not include the tap hole drilling, plugging or oxygen lancing operations. During the same tame period, it also caused or allowed emissions of particulate matter with an opacity greater than 20 percent to be released into the atmosphere from the C-5 blast furnace cast house during sax minute periods that included the tap hole drilling or plugging or oxygen lancing operations, all in violation of the opacity limits in its January 24, 1991 OEPA PTI.
- 45. Unless restrained by an Order of the Court, LTV may continue to violate such SIP requirements.
- 46. Pursuant to Section 113(b) of the CAA, 42 U.S.C. F. 7413(b), Pub. L. 104-34 and 61 Fed. Reg. 69364 (Dec., 31, 1996). Lev Steel is subject to injunctive relief and civil penalties not exceed \$25,000 for each day prior to January 31, 1997 on which it failed to comply with applicable Ohio SIP and PTI requirements and up to \$27,500 per day for violations occurring on or after January 31, 1997.

SECOND CLAIM FOR RELIEF

Cleveland Works: Opacity Violations at the C-6 Blast Furnace Cast House

- 47. The allegations in paragraphs 1 through 41 are restated here by reference.
- 48. On various occasions in March 1996, LTV caused or allowed emissions of particulate matter with an opacity greater than 20 per cent to be released into the atmosphere from the C-6 blast furnace cast house at its Cleveland Works facility, in violation of Ohio SIP Rule 3745-17-07(B)(3).
- 49. Pursuant to Section 113(b) of the CAA, 42 U.S.C. \$ 7413(b), Pub. L. 104-34 and 61 Fed. Reg. 69364 (Dec. 31, 1996), LTV is subject to civil penalties not to exceed \$25,000 for each day on which it failed to comply with applicable Ohio SIP requirements.

THIRD CLAIM FOR RELIEF

Cleveland Works: Opacity Violations at the No. 1 BOF Shop

- 50. The allegations in paragraphs 1 through 41 are restated here by reference.
- 51. On various occasions from at least June 28, 1993 through the present time, LTV caused or allowed the emission of particulate matter with an opacity greater than 20 percent, based on six minute averages, to be released into the atmosphere from the No. 1 BOF shop at its Cleveland Works facility, in violation of OPCB Rule AP-3-07(A) before June 27, 1994, and OAC 3745-17-07(A)(1) after June 27, 1994. These calculations take into account the three minute exceptions and six minute exceptions in each 60 minute time period provided for in the regulations before and after June 27, 1994, respectively.

- 52. Unless restrained by an Order of the Court, LTV may continue to violate such SIP requirements.
- 53. Pursuant to Section 113(b) of the CAA, 42 U.S.C. § 7413(b), Pub. L. 104-34 and 61 Fed. Reg. 69364 (Dec. 31, 1996), LTV is subject to injunctive relief and civil penalties not to exceed \$25,000 for each day prior to January 31, 1997 on which it failed to comply with applicable Ohio SIP requirements and up to \$27,500 per day for violations occurring on or after January 31, 1997.

FOURTH CLAIM FOR RELIEF

Cleveland Works: Violation of SO₂ Limits at C-1 Blast Furnace Stove

- 54. The allegations in paragraphs 1 through 41 are restated here by reference.
- 55. In each calendar quarter from January 1994 through the present time, emissions from the C-1 blast furnace stove at LTV's Cleveland Works exceeded the applicable SO₂ limit (0.024 lps./mmBTU) in the federal regulation at 40 C.F.R. § 52.1881(b) (L5)(xi)(A).
- 56. Unless restrained by an Order of the Court, LTV may continue to violate the federal SO, limit.
- 57. Pursuant to Section 113(b) of the CAA, 42 U.S.C. \$7413(b), Pub. L. 104-134 and 61 Fed. Reg. 69364 (Dec. 31, 1596), LTV is subject to injunctive relief and civil penalties not to exceed \$25,000 for each day of violation occurring before January 31, 1997 and up to \$27,500 a day for each of the violations occurring on or after January 31, 1997.

FIFTH CLAIM FOR RELIEF

Cleveland Works: Violation of SO2 Limits at Boiler 34

- 58. The allegations in paragraphs 1 through 41 are restated here by reference.
- 59. In all calendar quarters in 1994 and during the first three calendar quarters in 1995, LTV's Boiler 34 at its Cleveland Works exceeded the .024 lbs./mmBTU emission limit for SO, in the federal regulations at 40 C.F.R. § 52.1881(b)(15)(xi)(A).
- 60. Unless restrained by an Order of the Court, LTV may continue to violate the federal SO2 limit.
- 61. Pursuant to Section 113(b) of the CAA, 42 U.S.C. \$ 7413(b), and 61 Fed. Reg. 69364 (Dec. 31, 1996), LTV is subject to injunctive relief and civil penalties not to exceed \$25,000 for each day of violation prior to January 31, 1997 and up to \$27,500 per day for each of the violations occurring on or after January 31, 1997.

SIXTH CLAIM FOR RELIEF

Warren Facility: Discharge of Pollutants Not Authorized by NPDES Permit

- 62. The allegations in paragraphs 1 through 41 are restated by reference.
- 63. On various occasions from at least January 1994 to at least April 1996, LTV's Warren facility discharged pollutants from outfall 014 to the Mahoning River without authorization by JSEPA or OEPA pursuant to an NPDES permit.
- 64. Pursuant to Sections 309(b) and (d) of the CWA, 33 U.S.C. § 1319(b) and (d), LTV is subject to civil penalties not

to exceed \$25,000 for each day of violation alleged in the preceding paragraph.

SEVENTH CLAIM FOR RELIEF

Warren Facility: NPDES Permit Violations

- 65. The allegations in paragraphs 1 through 41 are restated here by reference.
- 66. On various occasions since at least January 1994 to at least January 1997, LTV's Warren facility has discharged pollutants from outfall 014 to the Mahoning River in violation of the effluent limits in the 1996 NPDES Permit issued by OEPA.
- 67. Pursuant to Sections 309(b) and (d) of the CWA, 33 U.S.C. § 1319(b) and (d), LTV is subject to civil penalties not to exceed \$25,000 for each day of violation alleged in the preceding paragraph.

EIGHTH CLAIM FOR RELIEF

Warren Facility: Improper Storage of Hazardous Waste

- 68. The allegations in paragraphs 1 through 41 are
- 69. On various occasions in February 1997, USEPA spectors observed an uncontained and uncovered pile of a zardous waste at LTV's Warren facility, in violation of the RRA storage requirements in OAC Rule 3745-52-34.
- 70. Pursuant to Section 3008(a) and (g) of RCRA, 42 J S.C. § 6928(a) and (g), and Pub. L. 104-134 and 61 Fed. Reg. 5:364 (Dec. 31, 1996), LTV is subject to civil penalties not to exceed \$27,500 per day for each day of violation alleged in the preceding paragraph.

PRAYER FOR RELIEF

WHEREFORE, plaintiff United States respectfully requests that this Court:

- 1. Permanently enjoin LTV from further violations of the Clean Air Act and the Clean Water Act;
- 2. Assess civil penalties against LTV not to exceed \$25,000 per day for each violation of the Clean Air Act, the Clean Water Act and the Resource Conservation and Recovery Act occurring prior to January 31, 1997 and \$27,500 per day for each violation occurring on or after January 31, 1997;
- 3. Grant such other and further relief as the Court may dem appropriate.

Pated: __/2/7/41

Respectfully submitted,

Assistant Attorney General

Environment and Natural Resources

Division

U.S. Department of Justice

MIRIAM L. CHESSLIN

Trial Attorney Environmental Enforcement Section Environment and Natural Resources

Division

U.S. Department of Justice

Post Office Box 7611

Washington, D.C. 20044-7611

(202) 514-1491

EMILY M. SWEENEY United States Attorney Northern District of Ohio ARTHUR I. HARRIS
Assistant U.S. Attorney
Bar # 0027128
1800 Bank One Center
600 Superior Avenue
Cleveland, Ohio 44114-2600
(216) 622-3711

OF COUNSEL:

John Tielsch Peter Felitti Associate Regional Counsel U.S. Environmental Protection Agency Region V



LAW DEPARTMENT

OHO DOY 218 673

73 PECEIV June 27, 1997 JUN 3 0 1997

U.S. EPA - REGION 5

DIVISION FRONT OFFICE Waste, Pesticides & Toxics Division

VIA OVERNIGHT MAIL

Robert Dean Smith Enforcement and Compliance Assurance Branch (DRE-8J) U.S. Environmental Protection Agency 77 West Jackson Blvd. Chicago, Illinois 60604

Re: LTV Steel Company, Inc. - Cleveland Works

Request for Information Concerning Use of Used Oil

Dear Mr. Smith:

Attached is another copy of the information sent to you on May 29, 1997 in response to the above request.

Very truly yours,

Hale & Papajcik / ang Dale E. Papajcik

Senior Attorney

enclosures DEP/CMF



RECEIVED

JUN 0 3 1997



LAW DEPT.

U.S. Environmental Protection Agency May 29, 1997 Enforcement and Compliance Assurance Branch (DRE-8J) 77 West Jackson Blvd. Chicago, Illinois 60604

Attention: Mr. Robert Dean Smith

Dear Mr. Smith:

Subject: LTV STEEL COMPANY, INC. - CLEVELAND WORKS

INFORMATION REQUEST - APRIL 17, 1997

SECTION 3007 RCRA AND SECTION 104(e) CERCLA U.S. EPA ID NO. OHD 004218673 AND OHD 046203774

This letter is in response to the information request of April 17, 1997, requesting certain information regarding LTV Steel's burning of used oil. Per conversation on May 1, 1997, between Dale Papajcik of LTV Steel and John H. Tielsch of U.S. EPA, the information requested is focused on the burning of used oil issues only. Additionally, Mr. Tielsch agreed to extend submittal of this information to the week of May 26, 1997.

U.S. EPA Request #1 -

Persons consulted in the preparation of the information were:

- 1. Dorothy M. Ellington, Research Oil Company
- 2. John W. Etchison, Manager Solid Waste, LTV
- 3. Robert A. Voytko, Engineer, Env. Control, LTV
- 4. Stanley Rihtar, Compliance Engineer, LTV
- 5. Peter Wosotowsky, Area Manager, Iron Producing, LTV
- 6. David Rupar, Area Manager, Utilities & Energy, LTV

U.S. EPA Request #2 -

Documents utilized in preparation of the information are included in Attachment A and Attachment D.

U.S. EPA Request #3 -

Additional persons who may provide more detailed response are referred to in Attachment A.

- 1. Alan Gressel, Research Oil Company
- 2. Bob Lehman, Research Oil Company

U.S. EPA Request #4 -

The EPA ID numbers for LTV Steel Cleveland Works are: OHD 004218673

OHD 004218673 OHD 046203774

U.S. EPA Request #5 -

Persons involved with handling the used oil are as follows:

- 1. Transportation and Unloading Research Oil Company Driver (1)
- 2. Tracking of Shipments LTV Steel Iron Producing Clerk (1)
- Maintenance of Equipment
 - a. LTV Utilities & Energy Process Automation Engineer (1)
 - b. LTV Utilities & Energy Test Engineers

Mr. Smith May 29, 1997 Page 2

- c. LTV Utilities & Energy Repair Technicians
- d. LTV Utilities & Energy Electronic and Instrument Repairman
- e. LTV Iron Producing Maintenance Supervisors (4)
- f. LTV Iron Producing Area Supervisors (2)
- q. LTV Iron Producing General Supervisor Maintenance (1)
- h. LTV Iron Producing Blower Foreman (8)
- i. LTV Iron Producing Turn Foreman (4)
- j. LTV Iron Producing Shift Manager (4)

U.S. EPA Request #6 -

Copies of all pertinent RCRA permit documents are included in Attachment B.

U.S. EPA Request #7 -

Copies of permit applications are included in Attachment B. Notifications of hazardous waste activities are included in Attachment

U.S. EPA Request #8 -

To rebut the presumption that used oil burned in LTV Steel's C5 and C6 blast furnaces with a total halogen concentration in excess of 1,000 ppm is a hazardous waste derived fuel, LTV Steel relies on a procedure adopted and followed by Research Oil Company (ROC), the only used oil fuel supplier to LTV Steel. The written ROC procedure is included as Attachment A. Data collected by ROC pursuant to the procedure and which relates to the data sheets provided by LTV Steel to the U.S. EPA and referred to in the information request, is included as Attachment D. Such data indicates that the oil material received by ROC, which is used in the production of the fuel shipped to LTV Steel, was not a hazardous waste containing material. Therefore, since ROC utilized no used oil containing a hazardous waste, their system, which produces the used oil shipped to LTV Steel, cannot and did not produce a hazardous waste derived fuel. Consequently, it is clear that the data generated by application of the ROC incoming oil analytic procedure successfully rebuts the presumption that the oil LTV Steel burns in C5 and C6 blast furnaces is a hazardous waste.

U.S. EPA Request #9 -

LTV Steel blast furnaces (Iron Producing Department) receives used oil processed for fuel from Research Oil Company (ROC) for use as a supplement to No. 6 oil for injection as fuel to blast furnaces C5 and C6, only. These blast furnaces are located at the facility with U.S. EPA ID No. 004218673. The oil is pumped directly from the ROC delivery tanker to the oil day tank, where it becomes mixed with the No. 6 fuel oil. The oil is pumped through a distribution system which heats and recirculates oil not injected back to the day tank. Flow controls at each blast furnace meter the oil for injection by injection pipes directly into the blast furnace tuyeres. Approximately four ROC tanker truck loads of used oil are received each weekday by LTV Steel.

Mr. Smith May 29, 1997 Page 3

Please contact me if you have any questions regarding any of the foregoing information.

Very truly yours,

LTV STEEL COMPANY, INC.

R. L. Nemeth

Manager

Environmental Control

Attachments

CERTIFIED - RETURN RECEIPT



May 23, 1997

LTV STEEL COMPANY 3100 E. 45th Street Cleveland, Ohio 44127-0000

Attention:

Mr. Stan Rihtar

Environmental Control Department

Dear Stan:

Enclosed with this letter are four items that detail the program and procedures used at Research Oil Company to manage the production of fuel oil from used oil in conformance with the requirements to rebut the presumption of mixing hazardous waste with used oil that arrives at our facility with a halogen content of 1,000 ppm or more. They are:

- 1. Explanation of Research Oil's used oil management procedures;
- 2. Memorandum on the microcoulometer from Bob Lohman to me;
- Research Oil Company Laboratory procedures for the microcoulometer; and,
- 4. A copy of microcoulometer procedures from the Dohrmann Operating Manual.

I believe these will satisfy your requirements. If you need further information, please call me on Wednesday, May 28 or if you need help on Tuesday, May 27, call Alan Gressel.

Sincerely,

Dorothy M/Ellington,

Environmental Compliance Manager

cc: Alan Gressel - ROC

Bob Lohman - ROC

OFF-SPEC FUEL OIL AND THE REBUTTABLE PRESUMPTION

Research Oil Company ships both on-spec and off-spec fuel oil to LTV. On-spec fuel oil exits the regulatory system before it is received at LTV. On-spec fuel oil can contain as much as 4,000 ppm of total halogens so long as the processor/marketer can successfully rebut the presumption that the fuel oil product is a hazardous waste because it contains in excess of 1,000 ppm total halogens. At Research Oil, the rebuttal of the presumption that oils containing in excess of 1,000 ppm of total halogens are hazardous results from a testing and management system that begins before the used oil is even shipped to the Research Oil plant.

At Research Oil, off-spec fuel is managed under the same system as on-spec fuel. The use of off-spec fuel in an industrial boiler or furnace impose certain recordkeeping requirements by the burner. These recordkeeping requirements for burning off-spec fuel containing more than 1,000 ppm total halogens are of considerable importance to LTV in order to insure that the plant operates in strict compliance with the requirements of Section 279 covering the management and burning of off-spec fuel oil. Below, we have outlined the management system employed by Research Oil to assure its customers, including LTV, that no hazardous waste fuel is ever shipped to their facilities.

The first step in our management of used oil is the requirement that all generators demonstrate that the oily liquid they intend to ship to us meets the definition of used oil. This information is communicated through completion of a generator profile and the submission of an adequate sample for analysis. Among the information required by the generator profile is the usage and management of the oil at its facility. This information helps us determine the pathways through which halogens may enter the used oil. The profile helps us answer such questions as, does the facility use chlorinated solvents? Are chlorinated waxes added to the virgin oil to improve its extreme pressure characteristics? Is the oil used in an emulsion? Are lubricating oils mixed with metalworking fluids before shipment? Does the generator collect used oil at the point of use or is the used oil recovered from a centralized wastewater treatment system?

The answers to these questions help us to understand the origin of halogens that may be found in the oil during analyses. We consider salt water and brine, chlorinated solvents introduced during or after use, and the various chlorinated wax additives used in metalworking lubricants. Our laboratory analyzes the samples submitted based on our understanding of the use of the oily waste stream at the point of generation.

During this analysis, we perform three or four specific tests to better understand the amount, type, and derivation of halogens detected in the used oil. We make use of the microcoulometer to determine total organic halogens, the gas chromatograph to identify individual solvent types and volumes, the GC to determine the presence of PCB's, and the FALEX EP tester to confirm the presence of chlorinated waxes introduced for the purpose of improved metalworking.

Based on the customer profile, conversations with the generator, and the analytic results from our laboratory, Research Oil, mindful of the rebuttable presumption, classifies the generator's waste stream into three categories: 1) oil that meets the requirements for processing into fuel oil upon arrival (under 1,000 ppm TOX); 2) oils that need to be checked to insure that the hazardous presumption can be rebutted from analytic results (over 1,000 ppm TOX); 3) oils that fail and must be used in our hazardous waste derived fuel program or rejected. Results of this work is used to determine the tests to be applied to the first shipment and to further shipments of waste from the generator, as well as the price to be paid or charged for the acceptance of the waste. If the generator is satisfied with our price which is based on our categorization of his waste stream, we will accept the material at our plant. Each incoming load is subjected to at least two analyses related to the volume and type of halogenated material in the waste stream. The minimum profile requirements on any inbound waste stream with organic content are a microcoulometer test to determine total halogens and a GC to determine PCB content. If the microcoulometer shows less than 1,000 ppm of total halogens and the PCB test less than 2 ppm, the oil may, subject to further analysis, be managed as on-spec oil.

If the microcoulometer indicated more than 1,000 ppm of total halogens, the volatile halogen content that is measured in the same microcoulometer test, is considered. If the original sample and prior shipment profiles differ from the analysis of this particular shipment, the GC is employed to determine the presence of solvents whose nature and volume would disqualify the material from being used in the production of on-spec or off-spec fuel oil. The GC analysis is used to determine if the particular shipment can be included in the raw material for the production of off-spec used oil or if the generator should be notified that the particular shipment is a hazardous waste by Research Oil analysis so that they can determine if they will pay us to manage the waste stream as a hazardous waste or if they want us to return the shipment.

If the microcoulometer test is consistent with the generator profile and the fingerprint of the first shipment, the shipment is pumped to the feed tanks for the fuel oil production system.

The standard parameter used at Research Oil to rebut the presumption that an oil with more than 1,000 ppm of halogens is hazardous is the presence of less than 100 ppm of any one solvent that appear on EPA's list of F001 and F003 halogenated solvents. Oils that exceed this levels are classified as hazardous waste.

I am confident that Research Oil's procedures meet every requirement that can be inferred from both Section 266, now in force in Ohio, and Section 279, soon to be adopted in Ohio, and will continue to protect our customers, our generators, and ourselves from any violation of EPA regulations.

MEMORANDUM

TO: Dorothy Ellington, Compliance Manager

FROM: Robert Lohman, Chief Chemist

DATE: May 22, 1997

SUBJECT: Rebuttable Presumption Testing

You inquired about the evolution of the analytic procedures we use at Research Oil to rebut the presumption that used oils received at the facility with more than 1,000 ppm of total halogens are hazardous waste. When the rebuttable presumption was first instituted, we used the microcoulometer to gain rapid, accurate, and efficient knowledge of the total organic chlorides in incoming samples. From the beginning, we tested each incoming load.

We were visited by Ms. Shirlee Brauer of Region 5 USEPA who was checking compliance with the new regulation. She asked how often we sampled incoming used oil for halogens. When we told her that we checked every load, she was shocked because she never contemplated our using anything but the Parr bomb to do these tests. When we showed her a microcoulometer procedure in SW 846,

USEPA's lab manual, she was satisfied.

As we used the microcoulometer, I developed a procedure to determine volatile (solvent) chlorine with the microcoulometer by first positioning the sample only part way into the furnace to burn off and record only the chlorine in volatile solvents. Since then we have reported halogens as VC for volatile chlorides and TC for total organic halogens.

A few years later, OEPA questioned our use of the microcoulometer to rebut the presumption. I then ran 50 samples on both the microcoulometer and on the GC. The correlation between a low volatile chlorine number (300 ppm or less) on the microcoulometer was compared to GC scans for solvents listed in F001 and F003 by USEPA. These 50 samples showed perfect correlation between microcoulometer readings under 300 ppm and GC scans of less than 100 ppm for any F001-F003 solvent.

We own and operate two Dohrmann microcoulometers. When I was visited by a Dohrmann technical representative, I demonstrated my method of determining both volatile chlorine and total organic halogens on the same sample in one procedures. Dohrmann was so impressed with this solution that they now sell all their machines with a mark to indicate the position of the sample boat to determine volatile chlorine and have included the procedure in their operating manual supplied to purchasers of microcoulometers.

Because of our experience and these endorsements of our procedure, we only use the GC in the rebuttable presumption procedures when it is important to determine which of the solvents listed under F001 and F003 is present in the used oil. This question usually arises when the specific solvent would be important to determining its source.

If I can be of further assistance, please let me know.

RL:cm

RUNNING SAMPLES

- 1. For samples, switch time to 10 minutes.
- 2. Position the boat under the injection port using the TX MODE.
- 3. Prepare samples the same as for the other machine using isooctane to extract the organic chlorine. (Samples can be diluted in water or injected directly but in these cases the results would be TX (total halides, organic and inorganic). We are interested in TOX (total organic halides) because these are potentially hazardous.
- 4. Inject 4 ul of sample, depress start, the boat will automatically move to the volatile position and remain there for 1 minute 30 seconds. If this is not long enough for the volatile to come off, switch the mode to EOX and the boat remains at this position. By switching back to TX the boat moves into the furnace for non-volatile chlorine. With the time setting at 10 minutes the counting will automatically stop. If this is still not enough time the sample will need a higher dilution factor. Watch baseline come back to original baseline (or close) to tell if all volatile has come off. Samples can also be run on ug (1000 ng/ug).

CALCULATIONS

$$VOX(ppm) = \frac{[integrated\ VOX\ reading(ng)\ -blank(ng)\]\ (dilution\ factor)}{[volume(ul)\]\Big[density\Big(\frac{mg}{ul}\Big)\Big](recovery\ factor)}$$

$$% VOX = \frac{ppm}{10,000}$$

$$TOX(ppm) = \frac{[integrated\ TOX\ reading(ng) - blank(ng)]\ (dilution\ factor)}{[volume(ul)][density(\frac{mg}{ul})](recovery\ factor)}$$

$$% TOX = \frac{ppm}{10,000}$$

VOX = Volatile Organic Halogen TOX = Total Organic Halogen volume = volume injected density = original sample weight (same as g/ml) recovery factor = std reading (ng)/standard (ng) 1000 ng = 1 ug

"OHRMANN"

UZ40 SCOTT BLVD., P.O. BOX 58007 SANTA CLARA, CA 95052-8007 TEL; (408) 727-6000 TELEX: 346395 FACSIMILE; (408) 727-1601

(513) 247 -7000

Acc* 170689

MC-3 ANALYZER MODULE SYSTEMS MANUAL

PROPRIETARY INFORMATION NOTICE

THIS DOCUMENT CONTAINS PROPRIETARY INFORMATION WHICH SHOULD NOT BE REPRODUCED OR TRANSFERRED TO DTHER DOCUMENTS OR DISCLOSED TO OTHERS OR USED FOR MANUFACTURING OR ANY PURPOSE OTHER THAN OPERATION, MAINTENANCE, OR SALE OF DOHRMANN EQUIPMENT WITHOUT PRIOR WRITTEN PERMISSION OF DOHRMANN

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Part No. 915-231

Edition 3: November 1988

APPENDIX D

DETERMINATION OF TRACE CHLORINE IN WASTE OIL AND SOLVENTS

I. INTRODUCTION

Recent EPA regulations determine the permitted use of recycled waste oil and solvents depending on the level of total halogen (TX) in the material. For example, any used oil to be sold for burning in non-industrial boilers must be tested for TX. A simple and accurate test for TX in oil is of great value to all producers, transporters, brokers, and users in the waste oil industry.

DOHRMANN's DX-20B is specifically designed for measurement of TX in waste oil and similar substances. It is sensitive well below the 1 ppm to avoid false positives and negatives at critical action levels.

II. SCOPE

The following methods are used for the determination of total halide (TX) concentration in organic samples in the range of 25 to 25,000 ngs. They are applicable to solids and other samples which cannot be drawn with an ordinary syringe.

SUMMARY OF METHOD

Without pretreatment, the analyst injects a sample onto a boat residing in an inert CO₂ (N₂, He or Ar) environment. After pressing "START," following baseline memorization, the boat is advanced to the 250° zone where entrained water and other volatiles are vaporized and, eliminated or measured, as desired. The boat is advanced again into the 1000° combustion zone where, in a 75% CO₂ and 25% O₂ environment, the sample is oxidized. The gaseous products of oxidation (including CO₂, H₂O, HX) are swept

into the detection cell where any halide or oxyhalide formed is coulometrically titrated with silver ion. That is, the total current required to replace the consumed silver ion and maintain a constant silver ion concentration in the cell is a direct measure of the chlorine present in the injected sample.

V. APPARATUS

- A. One of the following DOHRMANN systems:
 - DX-20B Total Halide Analyzer (p/n 832-282). This system includes all necessary instrumental hardware and glassware.
 - 2. DX-20A Total Organic Halide Analyzer (p/n 832-280) retrofitted with an EOX/TX solenoid valve assembly (p/n 899-479).

ATTACHMENT B

ENVIRONMENTAL CONTROL DEPT.
CLEVELAND DISTRICT

October 21, 1988

Ohio EPA P.O. Box 1049 1800 Watermark Drive Columbus, OH 43266-0149

Attn: Mr. Tom Crepeau

Division of Solid and Hazardous Waste

Re: LTV Steel Company

Cleveland Works (West)

OHD046203774 02-18-0391 Part B Call-In

Dear Mr. Crepeau:

I am responding to the Part B call-in received for the above referenced facility. A Part A application was submitted on November 14, 1980 and a HWFAB permit (02-18-0391) issued on December 28, 1981 for spent pickle liquor tanks (SO2) at the above referenced facility.

On January 5, 1983, the facility submitted a Part A withdrawal request to USEPA, Ohio EPA and HWFAB. The reason for the withdrawal being that the tanks were not storage tanks and met the definition of a less than 90 day accumulation unit. The unit continues to be such an accumulation unit. On April 4, 1983, the facility received acknowledgement from USEPA that the Part A permit for this facility was withdrawn (copy of USEPA letter attached).

Since 1983, LTV Steel has supplied Ohio EPA on numerous occasions with copies of the formal request for withdrawal of the permit. LTV Steel respectfully requests that Ohio EPA approve the permit withdrawal request for the SO2 unit at this time.

If you have any questions, please contact me at 216-429-6475.

Sincerely,

L. A. Szuhay/

Manager, Solld & Hazandous Waste

Environmental Control

LAS/dcr/4433a

Attachment

cc: Mr. Ed Lim, OEPA - Columbus

Mr. Kris Coder - OEPA, NEDO

Mr. Keith Dimoff - OEPA, Columbus

bcc: T. J. Harlan

L. E. Larson

R. L. Nemeth

W. L. West

T. A. Zalenski



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V 30 SOUTH DEARBORN S

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

APR 4 1983

REPLY TO ATTENTION OF: 5HW-13

Mr. D.L. Wise Western Division President Jones & Laughlin Corporation 2500 New York Avenue Whiting, Indiana 46394

RE: Withdrawal of Part A

(Pickle Liquor)

(Storage fewer than 90 Days)

FACILITY NAME: Jones & Laughlin

Cleveland Facility

U.S. EPA ID #: OHD 046-203-774

Dear Mr. Wise:

This is to acknowledge that the United States Environmental Protection Agency (U.S. EPA) has completed its review of your Part A Hazardous Waste Permit Application and your letter of January 5, 1983, requesting the withdrawal of your permit application. According to the information which you have submitted, your facility has accumulated wastes generated on-site for fewer than 90 days in containers or tanks since November 19, 1980, in accordance with 40 CFR 262.34. In addition, interim status is not required for waste pickle liquor that is being re-used in accordance with 40 CFR 261.6. It is the opinion of this office, based on the information submitted, that your facility is not required to have a hazardous waste permit under Section 3005 of the Resource Conservation and Recovery Act at this time.

Your status is that of generator only. The Part B application that was requested will therefore not be required. You must ensure that your waste is handled in accordance with 40 CFR Part 262 and applicable State and local requirements.

Please contact Mrs. Elizabeth Utley of my staff, at (312) 886-6162, if you have further questions

Singerely your

Karl J. Klepitsch, Jr., Chie

Waste Management Branch

cc: Tom Carlisle, OEPA

Scorge C. Smith, Technical Coordinator

Cleveland Works

Jones & Laughlin Corporation

July 6, 1988

U.S. Environmental Protection Agency Region V 230 S. Dearborn Street Chicago, Illinois 60604 JUL 07 1988

ENVIRONMENTAL CONTROL DEPT.
CLEVELAND DISTRICT

Attn: Mr. William E. Muno, 5 HS-13

Re: LTV Steel Company Cleveland Works - East OHD 004218673

Dear Mr. Muno:

This letter is in response to your Request for Part B Post-Closure Permit Application dated June 27, 1988 and confirms the telephone conversations with Mr. Robert Swale and Ms. Francine Norling of your staff.

LTV Steel has never owned or operated a RCRA land disposal unit at the above referenced facility. In fact, the only RCRA units existing at Cleveland Works-East (OHD 004218673) are storage tanks (S02) and a storage container (S01).

Please contact me if you have any questions or require anything additional.

Sincerely,

L. A. Szuhay

Manager-Solid and Hazardous Waste

Environmental Control

LAS/fh

Attachment

cc: Ms. Francine Norling
U.S. EPA Region V, Chicago

Mr. Ed Lim Ohio EPA, Columbus

4152a



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

27 JUN 1988

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURNED RECEIPT REQUESTED

L. Aguier
Superintendent Environmental Control
LTV Steel Company
3100 E. 45th Street
Cleveland, Ohio 44127

RE: Part B Post-Closure Permit Application LTV Steel Company OHD 004218673

Dear Mr. Aguier:

According to our records, your facility is subject to the interim status requirements under Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) as a hazardous waste management facility. Specifically, our records indicate that you submitted a closure plan for your hazardous waste management unit(s), involving closure as a landfill, for approval by the United States Environmental Protection Agency (U.S. EPA). All regulations referred to below are from 40 Code of Federal Regulations (40 CFR).

Any owner/operator of a hazardous waste disposal unit that closes after. January 26, 1983, without obtaining a RCRA permit, is required by §270.1(c) to have a permit for any applicable post-closure care period. The facility is responsible for complying with the interim status post-closure requirements of §265.117 through §265.120. In addition, per §264.90(a), as modified by RCRA Section 3005(i), a land disposal unit that receives hazardous waste after July 26, 1982, is a regulated unit and is subject to Part 264 post-closure requirements, including Subpart F, which addresses groundwater protection.

Under the authority of §270.10(e)(4), this is a formal request for submittal of Part B of the permit application for the above-referenced facility, covering specifically the post-closure requirements. If you submitted a Part B application prior to your decision to close the regulated units, then you may revise your Part B application to meet the post-closure requirements rather than the operating_standards.

RECEIVED
Juil 3 0 1988

ENVIRONMENTAL CONTROL

40 CFR §270.14(a) establishes the information requirements for a RCRA Part B permit. However, because of the inherent differences between an operating permit and a permit covering only post-closure activities, some application requirements in §270.14 are not applicable for a post-closure permit. Your facility is required to submit information in the Part B application that is relevant to post-closure care activities. Although informational requirements may be dependent upon site-specific conditions, at a minimum, it should include:

- A copy of the post-closure inspection schedule [§270.14(b)(5)];
- Ploodplain information [§270.14(b)(11)(iii iv)];
- A copy of the post-closure plan [§270.14(b)(13)];
- Ocumentation of the notice in deed or an appropriate alternative instrument [§270.14(b)(14)];
- ° Cost estimate for post-closure and post-closure financial mechanism
 [§270.14(b)(16)];
- A copy of the State financial instrument, if appropriate [§270.14(b)(18)];
- Groundwater data and information demonstrating compliance with requirements for detection monitoring, compliance monitoring and corrective action, as applicable [§270.14(c)];
- Information on solid waste management units and releases from those units [§264.101];
- Financial responsibility for corrective action (if applicable); and
- * For landfills and surface impoundments, exposure information [§270.10(j)].

As stated above, this list represents the minimum information that needs to be included in the permit application. In some cases, further information may be needed depending on the nature of the facility, waste characteristics and other factors. Please refer to the enclosed RCRA post-closure permit application checklist to help you in preparing a comprehensive and complete permit application. Should you have any questions or concerns in preparing the application, please contact Mr. Robert Swale of my staff, at (312) 886-6591.

Please be reminded that submission of the permit application must be made by November 8, 1988. Upon completion of the application, please send two copies to the U.S. EPA and three copies to the Ohio Environmental Protection Agency.

Please number each page of the application uniquely, including all attachments (maps, specifications, etc.). A certification statement identical to the one stated in 40 CFR §270.11(d) must accompany each application and all additional submittals. Send two copies of the application to the following address:

RCRA ACTIVITIES
Post-Closure Permit Application
U.S. EPA, Region V
Post Office Box A-3587
Chicago, Illinois 60604

Send three copies to: Thomas Crepeau

Ohio Environmental Protection Agency
Division of Solid & Hazardous Waste Management
Post Office Box 1049
Columbus, Ohio 43266-1049

The U.S. EPA looks forward to working with you toward fulfilling the above request. Again, should you have any questions concerning the above matter, please contact us for assistance.

Sincerely,

Wm. E. Mun-

William E. Muno Acting Associate Division Director Office of RCRA

Enclosure: RCRA Post-Closure Permt Application Checklist

cc: Paul Flannigan, OEPA

District Office Manager, OEPA

Ed Lim, OEPA

April 28, 1986

xcc: Kindular 9/3/86

Part A.

Certified Mail-Return Receipt Requested

Ohio Environmental Protection Agency Solid and Hazardous Waste Management Post Office Box 1049 Columbus, Ohio 43266 Attn: Mr. Thomas Crepeau

Per 5124

U.S. Environmental Protection Agency Region V Post Office Box A 3587 Chicago, Illinois 60604 Attn: RCRA Activities

4100 E 8-

Re: Withdrawal of Part A RCRA Permit Application
LTV Steel Company, Inc.
Cleveland (East) Works
3100 East 45th Street
Cleveland, Ohio 44127
U.S. EPA ID No. OHD 004 218 673
(HWFAB #02-18-0186)

Dear Readers:

Confirming previous verbal conversations, we are herewith submitting all required documentation to allow LTV Steel to withdraw the RCRA Part A permit for the Cleveland Works. This information also is submitted in response to Ohio EPA's letter of March 6, 1986 dealing with closure of tanks, and conforms to recent U.S. EPA letters regarding EPA Policy 121 for closure in place of tanks reverting to less than 90 day storage.

In conformance with a suggestion from Mr. Bill Muno of Region V of U.S. EPA, this submittal is in three parts:

- 1. Corrected of Part A to reflect current practice and regulations.
- 2. Closure in place of less than 90 day storage tanks.
- 3. Full closure of tanks no longer in use.

Certification statements, as required by 40 CFR 270.11, have been signed by W. G. Wiley, Vice President Flat Rolled, addressing the above information.

LTV Steel wishes to withdraw the subject Part A application and terminate its status as a hazardous waste storage facility. The Cleveland (East) Works wishes to continue to maintain its status as a generator of hazardous waste.

1. Corrected Part A

Republic Steel submitted the first application for a Part A permit on November 17, 1980 which was subsequently revised prior to entry into the

Hazardous Waste Facility Approval Board (HWFAB) Journal on December 28, 1981. Enclosed is Attachment 1-A which is the HWFAB permit.

Process Design Capacities listed were:

SO2 - 158,460 Gallons

Attached (1-B) is a listing of the SO2 storage facilities identified in the HWFAB permit.

On July 26, 1982, Republic Steel revised and corrected the Part A application to reflect regulatory and operational changes at the Cleveland Works. The application was resubmitted to the Hazardous Waste Facility Approval Board, the Ohio EPA and the U.S. EPA (Region V). On March 27, 1985, the Ohio EPA returned the July 26, 1982 reapplication explaining that there were no rules by which to process requests for permit changes. The letter from Ohio EPA is shown as attachment 1-C. In addition, no action was taken by any agency on the modification request because of the significant amount of time that had passed since the request was submitted. The Ohio EPA indicated that it was now in a position to consider a modification request and suggested that an updated permit change package be resubmitted should we still wish to pursue a change to the permit. The requested permit changes were never processed and the permit remains as originally issued.

The attached Part A application (2-A, 2-B, 2-C) dated April 28, 1986 has again been corrected by LTV Steel to reflect recent regulatory and operational changes at the Cleveland Works. Of the 158,460 gallons of storage allowed by the original application, the following amounts have been eliminated for the reasons listed:

Desulfurization Tanks	18,690	Desulfurization liquor not hazardous
	410	Desulfurization liquor not hazardous
Coal Tar Sludge Mill Tank	3,070	Recycled material (Closed Loop)
Dumpsters (coal tar sludge	4,761	Recycled material (Closed loop)
and tar material)	26,931	Gallons (TOTAL)

Additionally, the following item has been added to the total storage capacity:

60" Electro-Plate Acid Tank	15,000	Converted to Spent Pickle Liquor
		storage

This leaves a total of (158,460 - 26,931 + 15,000 *) 146,529 gallons storage. This is the total amount enumerated on the attached Part A application. Also, note the name change from Republic Steel Corporation to LTV Steel Company, Inc.

2. Closure in place (less than 90 day storage)

The five storage tanks containing hazardous wastes listed in Attachment 3-A will be emptied within every 90 day period. Closure of these tanks falls under EPA Policy 121 guidelines and the required certifications are included

as Attachments 3-B and 3-C. The total amount of storage for these tanks is 71,529 gallons. Waste management procedures to assure compliance with the less than 90 day storage period are described as Attachment 3-D. The agencies' review and approval of the procedure is requested for these five storage tanks.

3. Full closure of storage tank

The three storage tanks at the 98" Pickle Line are no longer used for storage of spent pickle liquor. The appropriate closure documents are attached and listed as Attachments 4-A through 4-C. The total amount of storage for these tanks is 75,000 gallons. The agencies' review and approval of the closure plan is requested for these three storage tanks.

The description above accounts for all of the storage volume and hazardous wastes listed on the original HWFAB permit. Should you have any question regarding the withdrawal of the Cleveland (East) Works Part A application, please contact Mr. Larry Szuhay at (216) 429-6475.

Thank you for your consideration.

Very truly yours,

W. G. Wiley, Jr.

W.G.Will

Vice President Flat Rolled

WGW/SH/fh

Attachments

cc: Kris Coder, Ohio EPA-Twinsburg

1818a

Withdrawal of Part A RCRA Permit Application LTV Steel Company, Inc. Cleveland (East) Works 3100 East 45th Street Cleveland, Ohio 44127 U.S. EPA ID No. OHD 004 218 673 (HWFAB #02-18-0186)

ATTACHMENTS

1. Background Information

- 1-A Approved HWFAB Permit dated December 28, 1981
- 1-B SO2 storage facilities December 1981
- 1-C Letter from Ohio EPA dated March 27, 1985

2. Corrected Part A

- 2-A Part A Application dated April 28, 1986
 Form 1
 Form 3
- 2-B Facility Drawing and Topographic Map
- 2-C Facility Photographs
 - 3 Spent Pickle Liquor Storage Tanks (98")
 - 2. 2 Spent Pickle Liquor Storage Tanks (84")
 - 3. 2 Spent Pickle Liquor Storage Tanks (Electro Plate)
 - 4. 1 Degreaser Sludge Storage Container (Electric Shop)

3. Closure in place (less than 90 day storage)

- 3-A Hazardous Waste Storage Tanks (April 1986)
- 3-B Container/Storage Closure Request (EPA Policy 121)
- 3-C Spill Certification Statement
- 3-D Hazardous Waste Management Procedures

4. Full closure of storage tank

- 4-A Tank Closure Plan dated April 28, 1986
- 4-B Facility Drawing
- 4-C Detailed Drawings

Foundation Location Tank Detail (typical)

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James A. Rhodes, Governor Woune S. Nichols, Chairman

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P.O. Box 1049 361 €. Broad St. Columbus, Ohio 43216 (6)4) 462-6981

Re: Permit No. 02-18-0186

DEC 2 8 1981

Republic Steel Cleveland District 3100 East 45th Street Cleveland, Ohio 44127

Attn: L. Aguier

Dear Permittee:

Transmitted herewith is a certified copy of your Hazardous Waste Facility Installation and Operation Permit (Permit) as such permit was entered into the Journal of the Board. The permit consists of the following:

- The standardized permit form (Findings and Conclusions and Issuance).
- 2) Terms and Conditions as approved by the Board (Special Terms and Conditions applicable to all permittees and Special Terms and Conditions for specific facilities).
- Portions of the approved Part A permit application indicating 3) the approved hazardous waste processes and design capacities and those hazardous wastes, identified by U.S. EPA Hazardous Waste Number, to be managed at the facility.

Processes, design capacities, and/or specific hazardous wastes which are stricken through or crossed out on the Part A permit application are not included in the approved permit. Unless otherwise notified by certified mail and afforded the opportunity for an adjudication hearing before the Board, all such deletions have occurred with the authorization of the applicant or his representative.

You are encouraged to carefully read the permit in its entirety. Any questions or comments concerning its content should be addressed to:

> Ms. Peggy J. Vince Executive Director Hazardous Waste Facility Approval Board P.O. Box 1049

361 East Broad Street

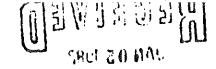
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H.W. T.A.B.



प्रकार क्षेत्रकार विकास है। इस्ट्राप्ट

YOU ARE HEREBY ADVISED THAT: All appeals of these matters are to the Court of Appeals of Franklin County, 369 South High St., Columbus, Ohio 43215, Attn: Deputy Clerk, and shall be pursuant to the provisions of Section 3734.05(C)(7) of the Revised Code.

Sincerely,

Peggy J. Vince

Peggy J. Vince Executive Director

PJV/ss

Enclosure

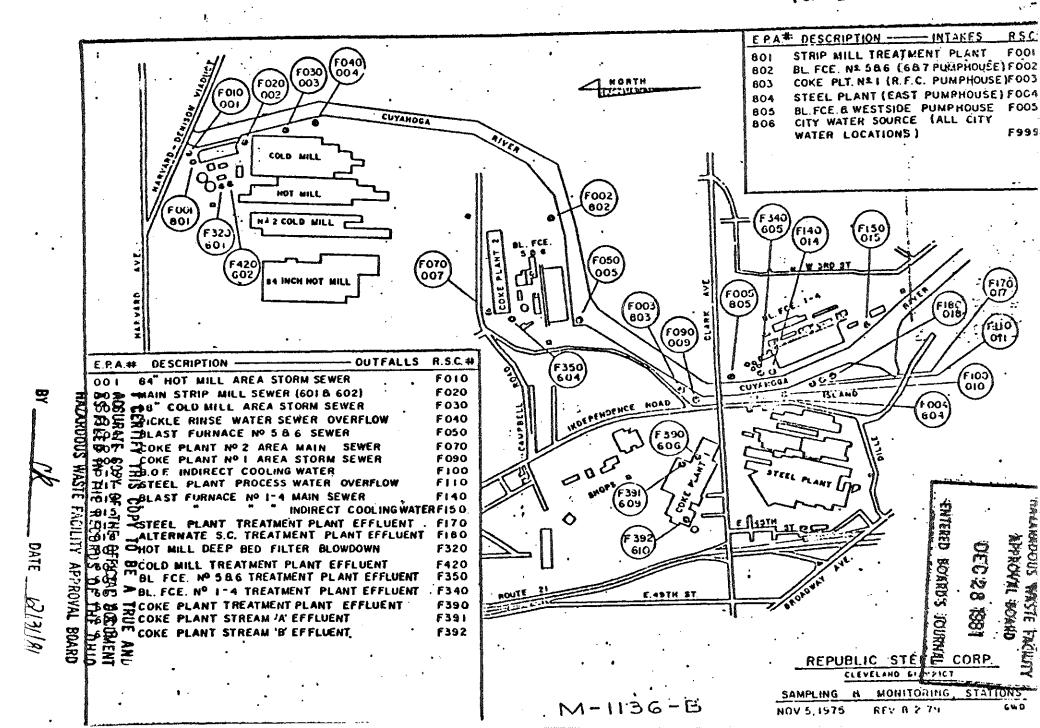
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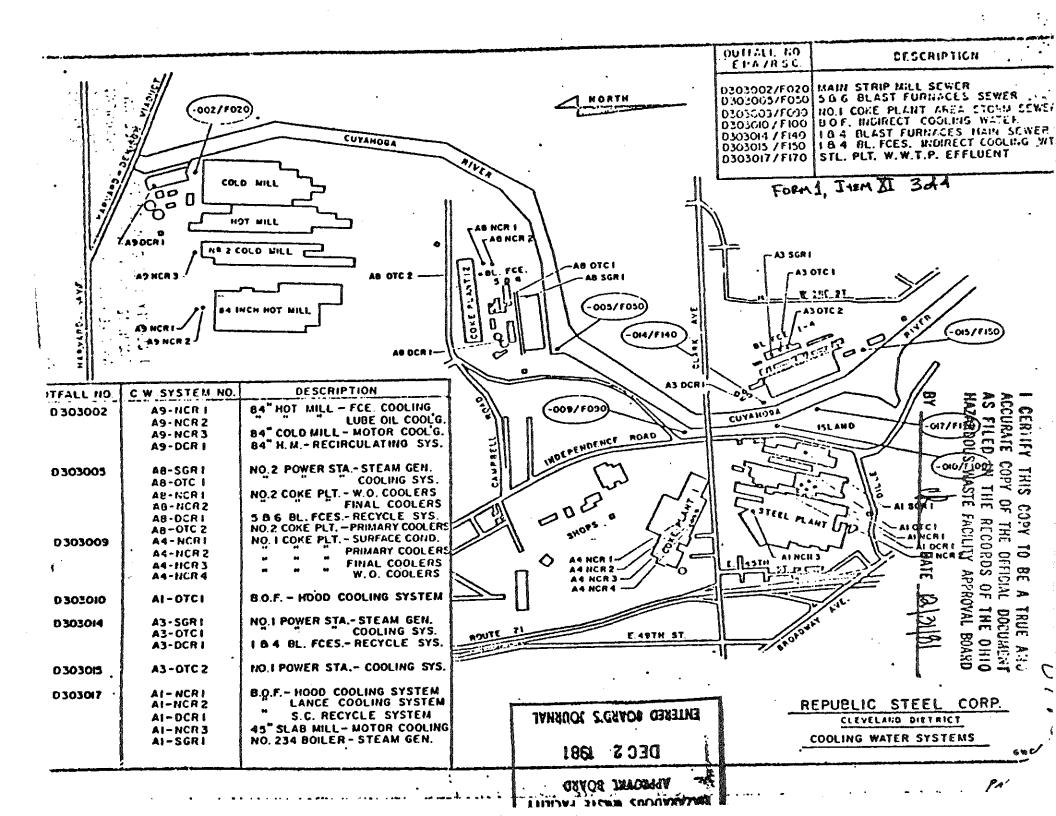
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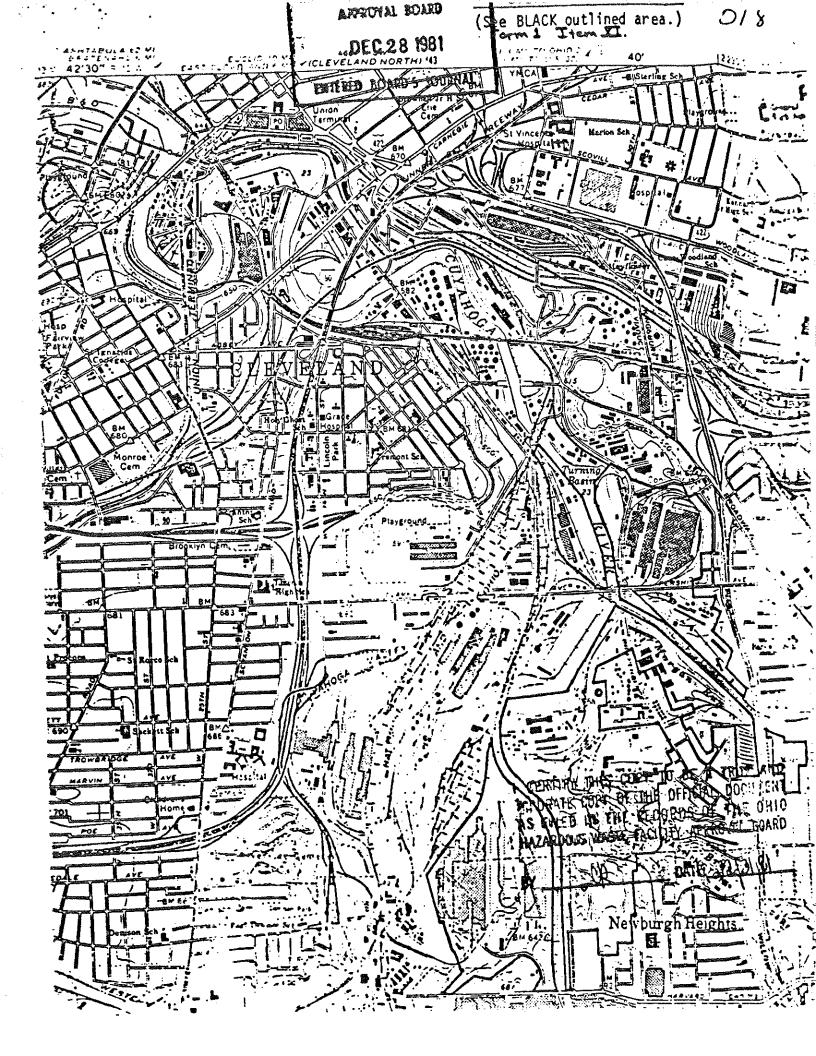
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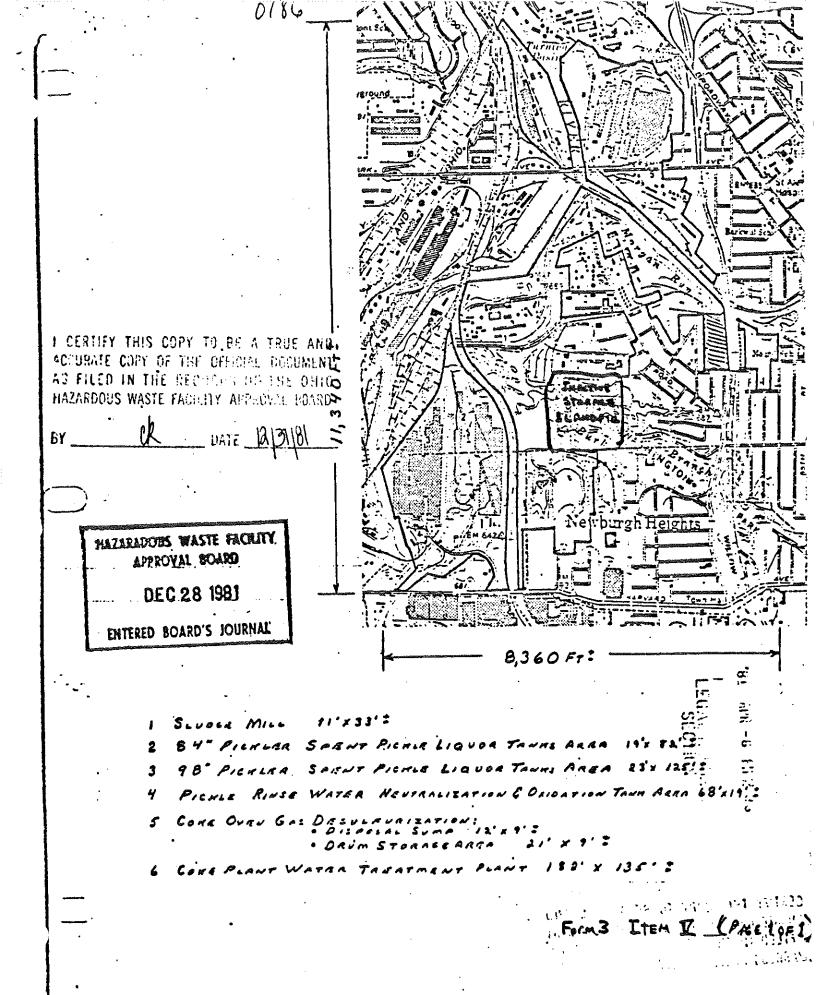
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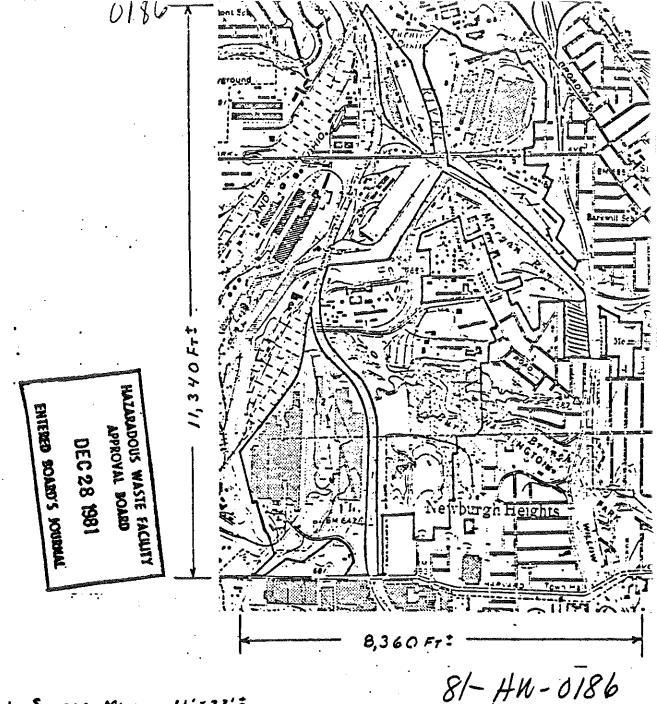
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V. FACILITY DRAWING				
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VI. PHOTOGRAPHS	All District Assets for the	60.7		7757
All existing facilities must include photographs	(aerial or ground-level)	that clearly delineate al	existing structures; existing storage	
treatment and disposal areas; and sites of future	storage, treatment or d	sposal areas (see instruc	tions for more detail).	
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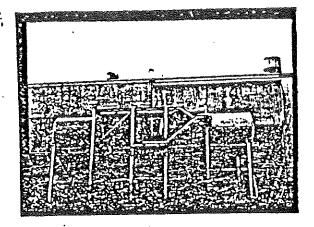


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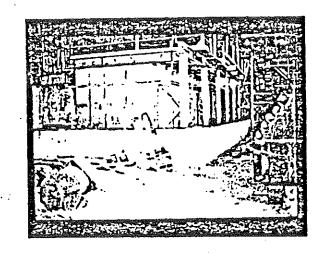
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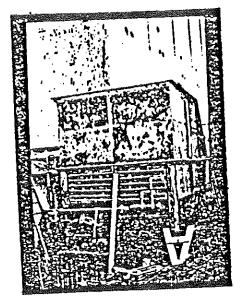
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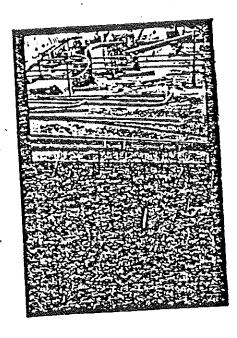
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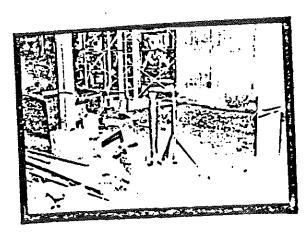
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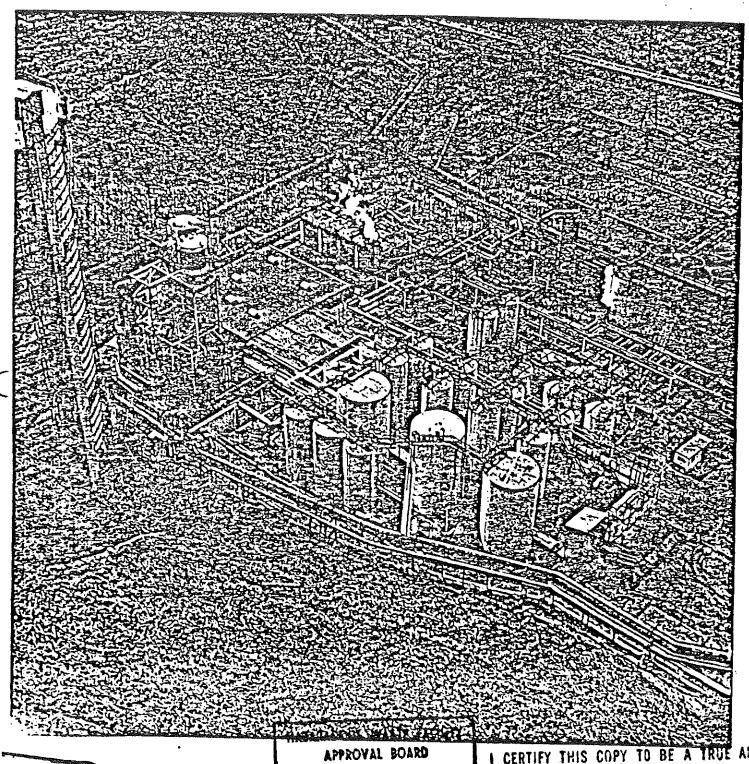
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CONA PLANT WATER TARAFMENT PLANT

SECTION VI (PAGE)

TERMS AND CONDITIONS (General)

- 1. Only those hazardous wastes as identified by the U.S. EPA Hazardous Waste Number(s) set forth in the approved permit application, attached hereto, may be managed at the facility and only pursuant to the specified processes and design capacities indicated and set forth in the approved permit application.
- 2. The Permittee and the facility shall comply with all applicable performance standards adopted by the Director of Environmental Protection pursuant to Division (D) of Section 3734.12 of the Revised Code.
- 3. The Permittee and the facility shall comply with all applicable requirements of Chapter 3734 of the Revised Code, the Ohio Hazardous Waste Rules, and the federal statutes and regulations concerning hazardous waste.
- 4. This permit shall expire three years after its date of issuance. The date of issuance is the date the resolution to issue the permit was passed by the Board.
- 5. This permit, in accordance with the procedures of the Board, may be modified, revoked, or alternatively revoked and reissued, to comply with applicable provisions of Chapter 3734 of the Revised Code or the Ohio Hazardous Waste Rules.
- 6. The annual permit fee, payable to the Treasurer of State, shall be submitted to and received by the Board on or before the anniversaries of the date of issuance, during the term of the permit.
- 7. Unless otherwise specifically provided, all studies, reports, data, plans and other information required to be submitted by this permit shall be transmitted to:

Hazardous Waste Facility Approval Board P.O. Box 1049 361 East Broad Street Columbus, Ohio 43216

The permit number shall be indicated on the transmittal letter.

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ATTACHMENT 1-B

Republic Steel Company

Cleveland Plant

WASTE STORAGE TANKS

December 1981

Coal Tar Sludge Mill - #2 Coke Plant 10 - Recycle Dumpsters	3,070 gallon tank 5,290 gallon containers
84" Pickle Line (Spent Hydrochloric Acid)	25,000 gallon tank 25,000 gallon tank
98" Pickle Line (Spent Hydrochloric Acid)	25,000 gallon tank 25,000 gallon tank 25,000 gallon tank
60" Electroplate Line (Spent Hydrochloric Acid)	6,000 gallon tank
Desulfurization of COG (Liquor and Sludges)	18,690 gallon tank 410 gallon tank

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158,460 gallons

TOTAL

XIVI PART

Re: Permit Change Request

Date of Request: 7/26/82 Date of Receipt: 8/04/82

OHD004218673

Ohio Permit No. 02-18-0186

MAR 27 1995

MAR 28 1985

ENVIRONMENTAL CONTROL DEPT.
CLEVELAND DISTRICT

Republic Steel Attn: R. L. Nemeth 3100 E. 45th St. Cleveland, OH 44127

Dear Sir or Madam:

We are in receipt of request(s) for change to your Ohio Hazardous Waste Installation and Operation Permit. Indicated above are the date(s) of your request(s) and the date(s) we received your request(s).

Unfortunately, at the time we received your permit change request(s) there were no rules in effect that allowed either Ohio EPA or the Hazardous Waste Facility Board (HWFB) to act upon those request(s). Consequently, your permit change request(s) were never processed and your permit remains as originally issued.

However, rules are now effective which allow Ohio EPA and the Ohio Hazardous Waste Facility Board (HWFB) to process requests for permit changes. Upon receipt of a request for change, the Ohio EPA will classify the requested change into one of two categories, either a revision or a modification. Basically, a revision is a change to your facility which does not impact the siting criteria contained in Section 3734.05(C)(6) of the Ohio Revised Code such as a facility requesting authority to process or handle wastes which are similar to wastes which they are currently authorized to process or handle. Permit revisions will be processed entirely by Ohio EPA. The package to be submitted for a revision should include a new Part A form, revised an appropriate, specifications and drawings where applicable, and a letter of justification for the change.

Conversely, a modification is a change to your facility which impacts the siting criteria contained in Section 3734.05(C)(6) of the Ohio Revised Code, e.g., a facility which requests authority to conduct regulated activities different from those previously authorized by the permit. Requests classified as modifications will be reviewed by Ohio EPA, but the final determination will be made by the Ohio HWFB. The package for a modification request should include the applicable portions of a Part B application, (including a modified Part A form) and a letter of justification for the change. Please refer to Rule 3745-50-51(B) of the Ohio Administrative Code for further guidance on whether a permit change is a revision or a modification.

Re: Modification Request Page Two

All requests for change, whether subsequently classified by Ohio EPA as modifications or revisions, should be submitted to:

Ohio EPA
Division of Solid and Hazardous Waste Management
Attn: Thomas E. Crepeau, Manager
Data Management Section
P.O. Box 1049
Columbus, Ohio 43216-1049

We are now in a position to consider your request if you wish to pursue a change to your HWFB permit. However, no action will be taken on the above-referenced modification request(s) because of the significant amount of time that has passed since these request(s) were submitted. Therefore, in order to be sure of your present intentions, we request that you resubmit an updated permit change package if you still wish to pursue a change to your permit.

If you do not wish to pursue a change of your original permit, you need not resubmit at this time. In any case, if we do not hear from you we will assume that you no longer desire a change to your permit at this time, and any previous requests of this nature will be voided.

If you have further questions concerning changes to your hazardous waste permit, please contact Bolaji Dosunmu at (614) 462-8388.

Sincerely,

Steven H. White, Chief

Division of Solid and Hazardous Waste Management

SW/ds

cc: D.O.

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I. PROCESSES (continued) SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "TV4"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.	₩.>

- IV. DESCRIPTION OF HAZARDOUS WASTES

 A. EFA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpart 0 for each disted hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number/s/ from 40 CFR, Subpart C that describes the charactersrics and/or the toxic contaminants of those hazardous wastes.
- 3. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed wastels) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

	METRIC UNIT OF MEASURE	CODE
ENGLISH UNIT OF FEASURE	KILOGRAMS	
BOUNDS	METRIC TONS	M
TONS	METRIC TORS	, , , , , , , , , , , , , , , , , , , ,
TUNB.		

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

For listed hazardous waste: For each listed hazardous waste entered in column A select the code/s/ from the list of process codes contained in Item III 1. PROCESS CODES: to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess

Note: Four spaces are provided for entering process codes, if more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B.C. and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

quantity of the waste and describing an are processes to be used to freet, store, analysis of she used to describe the waste, in column D(2) on that line enter in column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste, in column D(2) on that line enter

"included with above" and make no other entries on that line. 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV Ishown in line numbers X-1, X-2, X-3, and X-4 below! — A facility will treat and dispose of an estimated 900 bounds per year of chrome shavings from leather tanning and finithing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 bounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

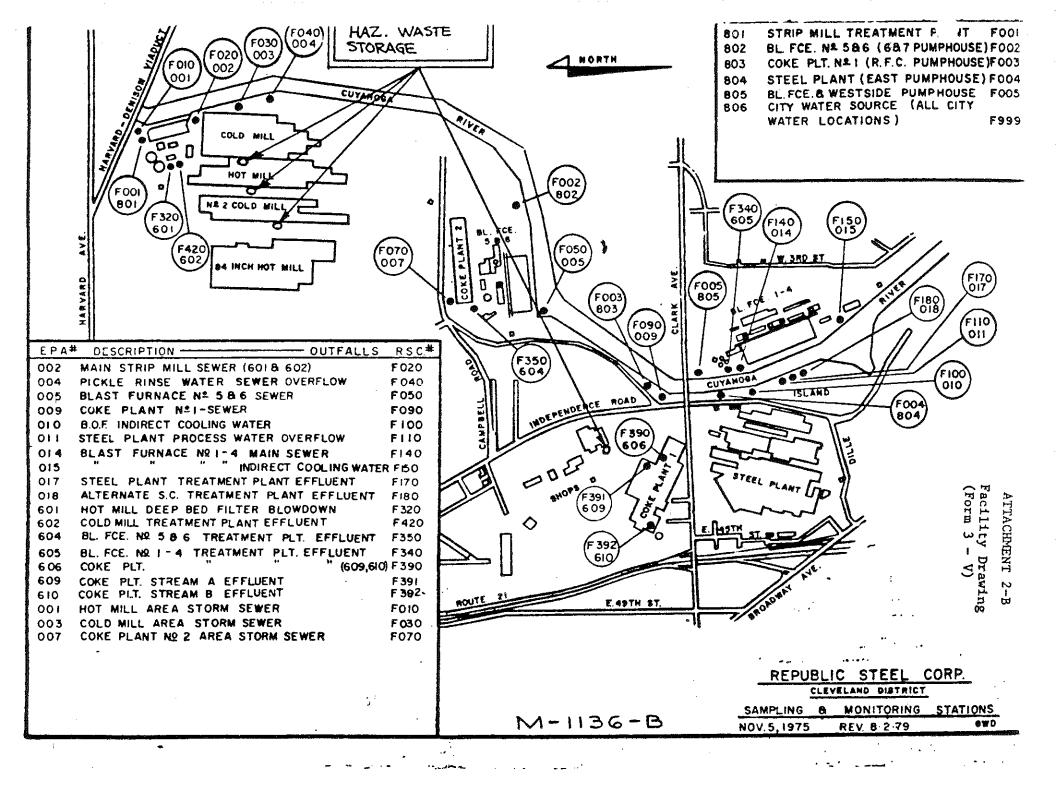
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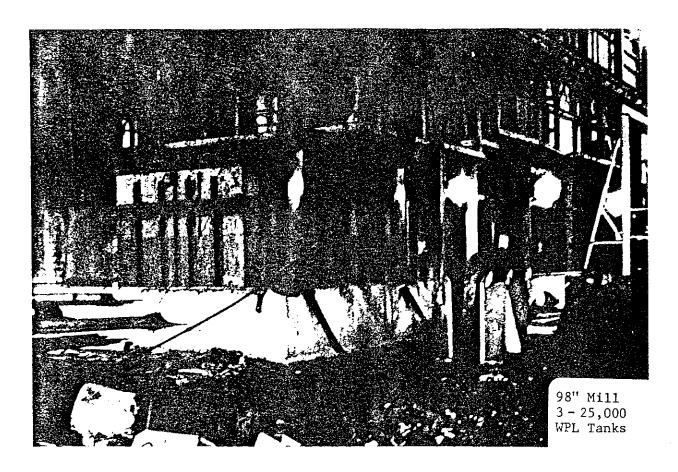
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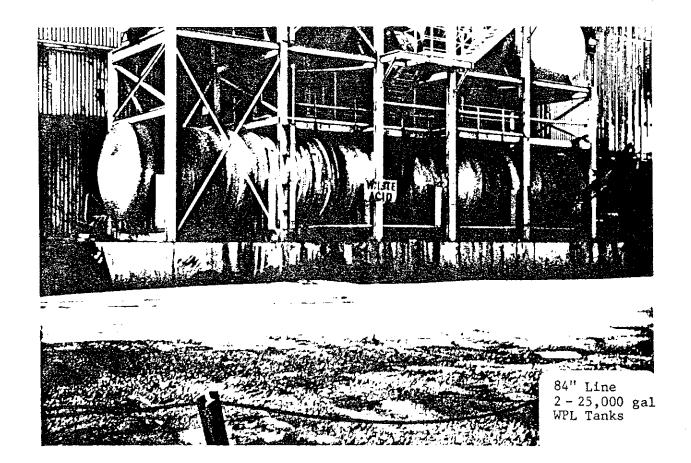
V. DESCRIPTION OF HAZARDOUS WASTES (continued)

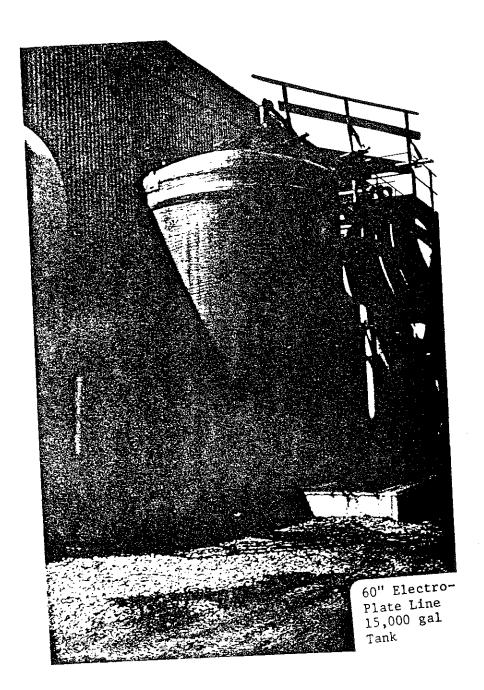
E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.



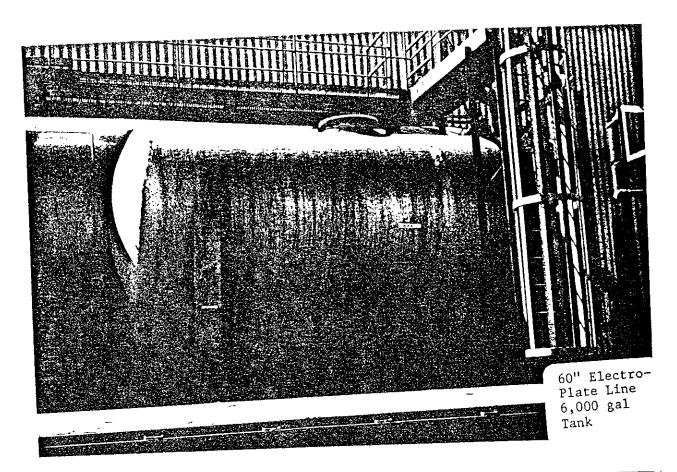
ATTACHMENT 2-C
Photograph (Form 3 - VI)
April 1986

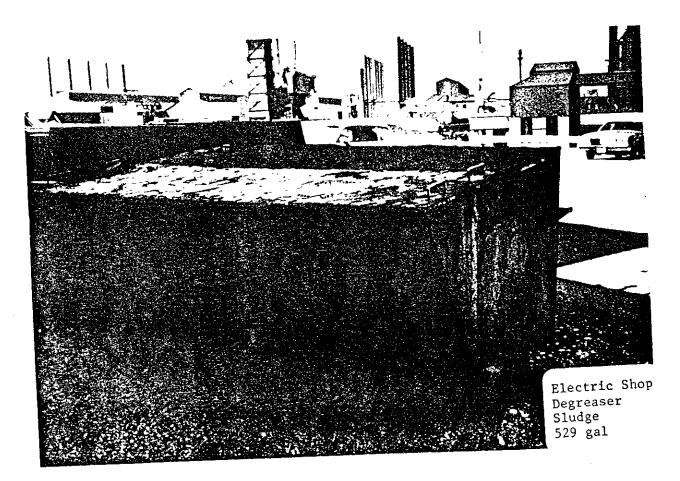






ATTACHMENT 2-C
Photograph (Form 3 - VI)
April 1986





ATTACHMENT 3-A

LTV Steel Company, Inc. Cleveland (East) Works WASTE STORAGE TANKS

April 1986

84" Pickle Line	25,000 gallon tank
(Spent Hydrochloric Acid)	25,000 gallon tank
60" Electroplate Line	15,000 gallon tank
(Spent Hydrochloric Acid)	6,000 gallon tank
Electric Repair Shop (Degreaser Sludge)	529 gallon container
TOTAL	71,529 gallons

GENERATOR ACCUMULATING WASTE ON-SITE IN COMPLIANCE WITH 40 CFR 262.34

(APPLICABLE TO FACILITIES WHICH, AS OF NOVEMBER 19, 1980, HAVE BEEN STORING WASTES IN CONTAINERS AND/OR TANKS ONLY)

Facility Name:

LTV Steel Company, Inc.

Facility Location:

Cleveland (East) Works

Mailing Address:

3100 East 45th Street Cleveland, OH 44127

U.S. EPA ID No .:

OHD 004 218 673

1. I certify, in reference to the above-named facility, that a complete and accurate description of the activities currently conducted, for purposes of the Resource Conservation and Recovery Act (RCRA), are those of a generator accumulating waste on-site, in compliance with 40 CFR 262.34. This description of activities shall be considered effective as of

April 15, 1986
(Please type, in above space: today's date, or other appropriate past date)

- 2. I certify that all hazardous waste which had been stored at this facility for greater than 90 days have been permanently removed, and -- for that portion of the wastes that were present on-site on or after November 19, 1980 -- the manifest requirements of 40 CFR Part 262 have been complied with, and all manifests are on file at this facility, available for inspection by authorized State and Federal officials.
- 3. I finally certify under penalty of law that I have personally examined, and am familiar with the information submitted in this document and all attachments, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

W. G. Wilospil.

W. G. Wiley, Jr. Vice President Flat Rolled

4/20/86

Signature

Typed Name and Title

Date

(Please have appropriate official, per 40 CFR 270.11, sign and date)

Spill Certification Statement

I certify under penalty of law that no reportable spills occurred in the area where hazardous waste was stored during the RCRA storage period. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the above statement is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

OHD 004 218 673

Permit No.

LTV Steel Company, Inc. Cleveland (East) Works Facility Name

Signature of Executive Officer

Vice President Flat Rolled LTV Steel Company, Inc.

7 28 86 Date

LTV STEEL COMPANY, INC. CLEVELAND WORKS - EAST HAZARDOUS WASTE MANAGEMENT

This procedure is established to ensure that no accumulation of hazardous waste occurs in the below listed storage tanks and containers for greater than 90 days.

- 1. Within every 90 days, the responsible department will empty their hazardous waste storage tanks or containers.
- 2. A record of this emptying will be made in the department permanent log.
- 3. The department Superintendent will send verification of this activity to the Cleveland Works Environmental Control Department. Verification will be a copy of permanent log indicating the date this activity was performed.
- 4. Cleveland Works Environmental Control will maintain a file of the verifications. Also in this file will be copies of the procedures utilized to empty the tanks and containers.
- 5. This procedure will commence April 1, 1986.

The storage tanks and containers involved are as follows:

- 1. Waste Acid Tanks 84" Pickle Line (2 25,000 gallon)
- 2. Waste Acid Tanks 60" Electroplate Line (1 15,000 gallon) (1 6,000 gallon)
- Degreaser Sludge Container Electric Repair Shop (1 - 529 gallon)

This procedure may be adjusted as necessary at any time.

LTV STEEL COMPANY, INC. - CLEVELAND WORKS E.P.A. IDENTIFICATION NO. OHD 004 218 673 HWFAB NUMBER 02-18-0186 TANK CLOSURE PLAN APRIL 28, 1986

The LTV Steel Company, formerly Republic Steel Corporation, is planning to close three spent pickle liquor tanks. The following closure plan has been developed utilizing the Draft Review Guidance document (12-10-85) provided by the Ohio E.P.A.

1. DESCRIPTION OF FACILITY

LTV Steel Company, Inc., Cleveland Works - East, is a basic flat rolled steel producer located at 3100 East 45th Street, Cleveland, Ohio. The three (3) spent pickle liquor tanks are associated with the 98" Pickle Line, whose operations were suspended in July 1984.

2. DESCRIPTION OF WASTE MANAGEMENT UNITS TO BE CLOSED

Each of the tanks is rubber lined steel, with a capacity of 25,000 gallons. The material stored in these tanks was spent hydrochloric pickle liquor, K062. These tanks are identified on Revised Part A Application dated 4/28/86, Section III C, Line 1.

3. MAP OF FACILITY

A plant location map is attached.

4. DETAILED DRAWING OF UNIT(S) TO BE CLOSED

The following detailed drawings of the tanks are attached:

64491 (1-16-68) Foundation Location SK-11370 (1-16-67) Tank Detail (Typical)

5. LIST OF HAZARDOUS WASTE

Spent hydrochloric pickle liquor (KO62) was the only waste stored in these tanks. The maximum potential storage capacity was 75,000 gallons. The tanks are presently empty.

SCHEDULE FOR CLOSURE

See Item 9 and Item 15.

7. AIR EMISSIONS

Not Applicable

8. PERSONNEL SAFETY AND FIRE PREVENTION

All wastes and materials used in this procedure are enclosed in pipelines, sealed vacuum trucks or tankers. There is minimal potential for exposure to personnel. However, established plant safety procedures are utilized in handling of acids and caustics, including the use of personal protective safety equipment where applicable.

9. DECONTAMINATION EFFORTS

The steps for decontamination are as follows:

- a. Vacuum any liquids and solids from the tanks. Transport this material to the LTV Steel Regeneration Plant in Warren, Ohio.
- b. Rinse the tanks with water. Remove and transport this rinse to the rinse water system at the Strip Mill Water Treatment Plant, a NPDES facility.
- c. Fill the tanks with water. Pump this water to the Strip Mill Water Treatment Plant. Continue this process until the pH of the water is above 7.0.

NOTE: Because the building in which the tanks are located is not heated, the above steps were completed in November 1985. These steps were taken to prevent the possibility of freeze damage to the tanks.

- d. Fill the tanks with lime slurry. Remove this slurry to the Strip Mill Water Treatment Plant EGL system where it will be used for pH control.
- e. Rinse tanks with water and direct to the Strip Mill Water Treatment Plant. Test this rinse for pH and metals of concern.
- f. Rinse inlet pipes with 20 percent sodium hydroxide. Transport this material to the Strip Mill Water Treatment Plant for pH control.
- g. Rinse inlet pipes with water. Pump this rinse to the Strip Mill Water Treatment Plant.
- h. Blank tank inlets.

Refer to Item 15.

10. "CLEAN" LEVELS FOR SOIL

As these tanks are mounted on a diked concrete pad, soil contamination considerations are not applicable.

11. SAMPLING PLAN AND ANALYTICAL METHODS

There is no record of any reportable quantity spills from this facility.

12. DESCRIPTION OF REMOVAL EFFORTS

Not Applicable

13. SPECIFICS FOR LANDFILL CLOSURES

Not Applicable

14. DESCRIPTION OF EQUIPMENT CLEANING

H&H Industrial, an industrial cleaning specialist, has been contracted to perform all of the steps for decontamination.

15. CERTIFICATION

R. E. Warner & Associates, Consulting Engineers, 2130 West Park Drive, Lorain, Ohio 44053, have been retained to provide any and all necessary engineering services. Certification of closure will be provided by LTV Steel Company, Inc. and R. E. Warner & Associates within 30 days of completion of closure.

16. STATUS OF FACILITY AFTER CLOSURE

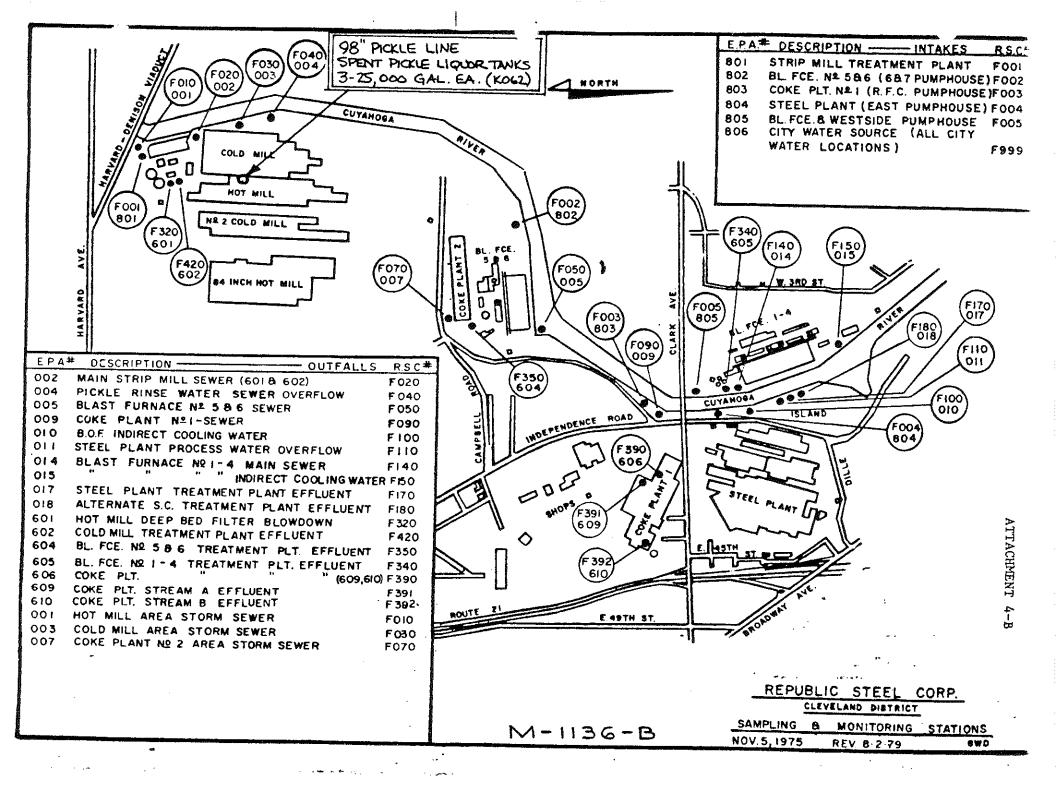
After closure, the tanks will remain in place.

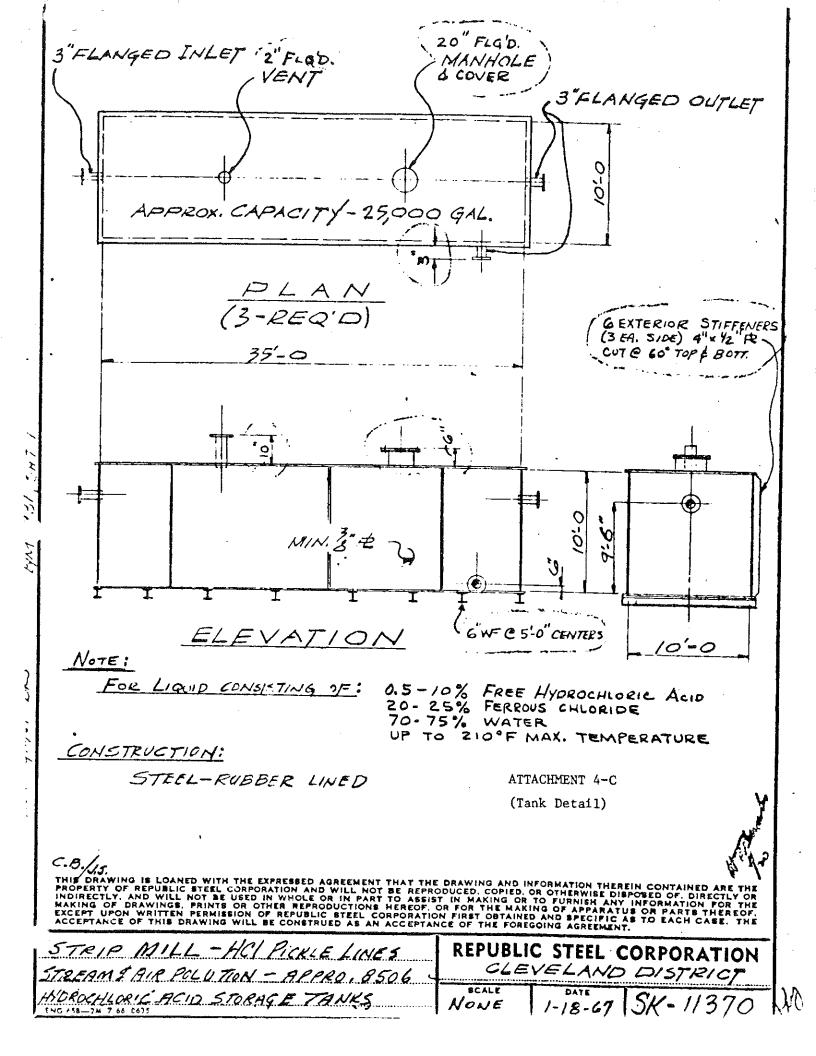
17. NUMBER OF COPIES OF PLAN

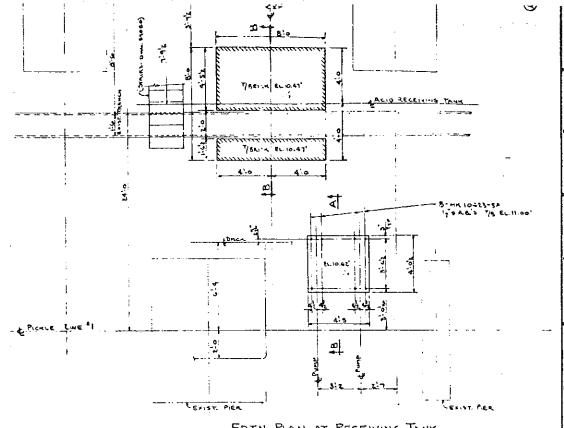
Three (3) copies of this plan are being submitted to Thomas Crepeau, Ohio E.P.A., Division of Solid and Hazardous Waste Management, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

18. CLOSURE REGULATIONS

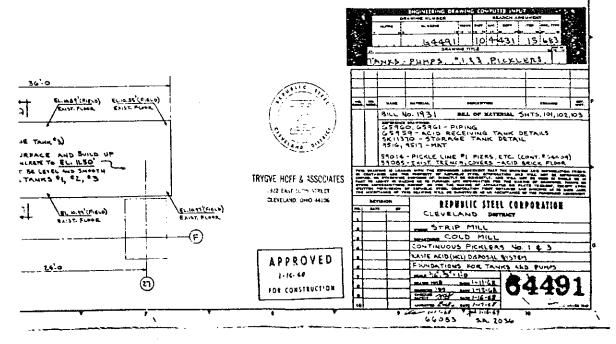
Not Applicable.







FOTH PLAN AT RECEIVING TANK



ATTACHMENT 4-C (Foundation Location)

LTV Steel Company

bcc: J. L. Bush H. R. Clagg

L. E. Larson

R. P. Muhlhan

R. L. Nemeth

J. V. Stack

M. A. Suhoza

W. L. West W. G. Wiley

R. C. Windahl T. A. Zalenskí

Certified Mail-Return Receipt Requested

U.S. EPA Region V Post Office Box A3587 Chicago, Illinois 60604

Ohio EPA Post Office Box 1049 Columbus, Ohio 43216-1049

January 27, 1986

Attn: RCRA Activities

Gentlemen:

Pursuant to the requirements of 50 FR 49164 (November 29, 1985), LTV Steel
Company, Inc. is hereby filing a subsequent notification of its burning
activities under section 3010 of RCRA.

It the above referenced facility, LTV Steel Company, Inc. presently burns
nazardous waste fuel (Cadence Product 312) in blast furnace(s) which are
industrial furnace(s) under the definitions in 40 CFR 260.10. In addition,
his facility also burns both specification and off-specification used oil
uels in steel plant combustion facilities which are "industrial boilers"
id/or "industrial furnaces" as defined in 40 CFR Part 260.10.

V Steel Company, Inc. does not intend to store hazardous waste fuel
idence Product 312) prior to burning. Thus, this notification is for the
ting of hazardous waste fuel and not a notice, prerequisite for initus, for storage.

Very truly yours,

esident Engineering

JMF/fh

1554a

Certification Statement

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. M. Firley

Vice President Engineering

LTV STEEL Co., Inc.

JAN 28, 1986

Date



Republic Steel Corporation Cleveland District
3100 East 45th Street Cleveland OH 44127

October 6, 1983

Mr. David N. Wertz Ohio E.P.A. Northeast District Office Division of Hazardous Material Management 2110 East Aurora Road Twinsburg, Ohio 44087

Dear Mr. Wertz:

Subject: REPUBLIC STEEL CORPORATION - CLEVELAND DISTRICT HAZARDOUS WASTE FACILITY INSPECTION

The following is provided as documentation for correction of the violations and/or concerns noted from your inspection of the Cleveland District facility on August 3, 1983:

Lecoup Lecoup

- Refer to response sent to your office by Mr. D. M. Gubanc of Republic Steel with regard to this item.
- The tar decanter sludge boxes have been marked with the wording "Hazardous Waste", and the Electric Shop degreaser sludge container has been fitted with a placard for indicating accumulation date. The tar decanter sludge boxes have been marked with the wording "rotated daily", to fulfill the accumulation date requirement.
- A maximum liquid level indicator has been installed at the sludge mill feed tank to allow for a minimum freeboard of two-feet. A checkoff of this minimum freeboard is included in the daily inspection log of this equipment.
- A separate log book has been instituted at the Electric Shop for recording the weekly inspection of the degreaser sludge container.

Mr. Wertz October 6, 1983 Page 2

The Contingency Plan section of the Hazardous Waste Administrative Plan is currently under review to include a more detailed description of emergency equipment specifics and location. The revised section will be forwarded to your attention when completed.

I trust that this answers your request. Please advise if you have further questions regarding this matter.

Very truly yours,

REPUBLIC STEEL CORPORATION

R. L. Nemeth Superintendent

Environmental Control

RLN:db

bcc: J. P. Charles R. H. Tindal J. F. Carter D. P. Thompson H. R. Clagg R. Flandermeyer J. O. Stright R. P. Callihan M. S. Hross G. H. Mautz J. J. Zamborsky S. P. Kurilko A. C. Zaruba T. M. Girdler M. A. Vanek E. T. John W. L. West S. Rihtar M. Gubanc M. A. Kall J. A. McKinney File: 0.55.0-154.02 '411'

Xilos Partol

Re: Permit Change Request

Date of Request: 7/26/82 Date of Receipt: 8/04/82

OHD004218673

Ohio Permit No. 02-18-0186

MAR 27 1995

MAR 28:985

ENVIRONMENTAL CONTROL DEPT. CLEVELAND DISTRICT

Republic Steel Attn: R. L. Nemeth 3100 E. 45th St. Cleveland. OH 44127

Dear Sir or Madam:

We are in receipt of request(s) for change to your Ohio Hazardous Waste Installation and Operation Permit. Indicated above are the date(s) of your request(s) and the date(s) we received your request(s).

Unfortunately, at the time we received your permit change request(s) there were no rules in effect that allowed either Ohio EPA or the Hazardous Waste Facility Board (HWFB) to act upon those request(s). Consequently, your permit change request(s) were never processed and your permit remains as originally issued.

However, rules are now effective which allow Ohio EPA and the Ohio Hazardous Waste Facility Board (HWFB) to process requests for permit changes. Upon receipt of a request for change, the Ohio EPA will classify the requested change into one of two categories, either a revision or a modification. Basically, a revision is a change to your facility which does not impact the siting criteria contained in Section 3734.05(C)(6) of the Ohio Revised Code such as a facility requesting authority to process or handle wastes which are similar to wastes which they are currently authorized to process or handle. Permit revisions will be processed entirely by Ohio EPA. The package to be submitted for a revision should include a new Part A form, revised 23 appropriate, specifications and drawings where applicable, and a letter of justification for the change.

Conversely, a modification is a change to your facility which impacts the siting criteria contained in Section 3734.05(C)(6) of the Ohio Revised Code, e.g., a facility which requests authority to conduct regulated activities different from those previously authorized by the permit. Requests classified as modifications will be reviewed by Ohio EPA, but the final determination will be made by the Ohio HWFB. The package for a modification request should include the applicable portions of a Part B application, (including a modified Part A form) and a letter of justification for the change. Please refer to Rule 3745-50-51(3) of the Ohio Administrative Code for further guidance on whether a permit change is a revision or a modification.

Re: Modification Request

Page Two

<u>All</u> requests for change, whether subsequently classified by Ohio EPA as modifications or revisions, should be submitted to:

Ohio EPA
Division of Solid and Hazardous Waste Management
Attn: Thomas E. Crepeau, Manager
Data Management Section
P.O. Box 1049
Columbus, Ohio 43216-1049

We are now in a position to consider your request if you wish to pursue a change to your HWFB permit. However, no action will be taken on the above-referenced modification request(s) because of the significant amount of time that has passed since these request(s) were submitted. Therefore, in order to be sure of your present intentions, we request that you resubmit an updated permit change package if you still wish to pursue a change to your permit.

If you do not wish to pursue a change of your original permit, you need not resubmit at this time. In any case, if we do not hear from you we will assume that you no longer desire a change to your permit at this time, and any previous requests of this nature will be voided.

If you have further questions concerning changes to your hazardous waste permit, please contact Bolaji Dosunmu at (614) 462-8388.

Sincerely,

Steven H. White, Chief

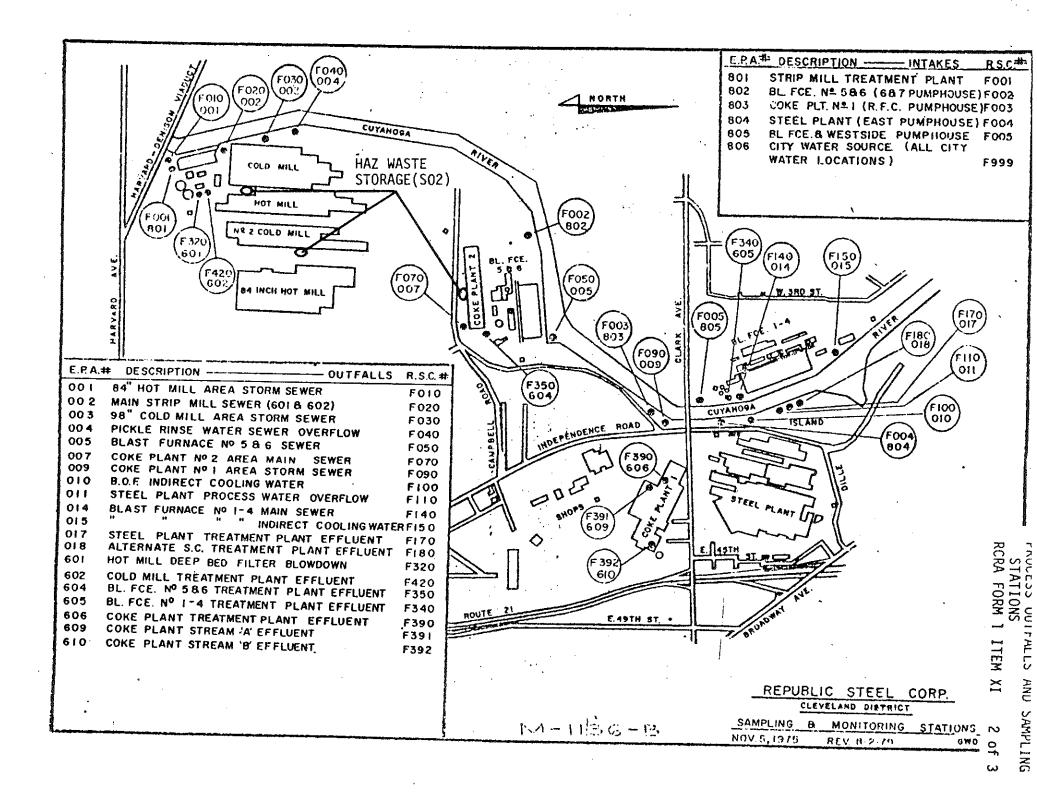
Division of Solid and Hazardous Waste Management

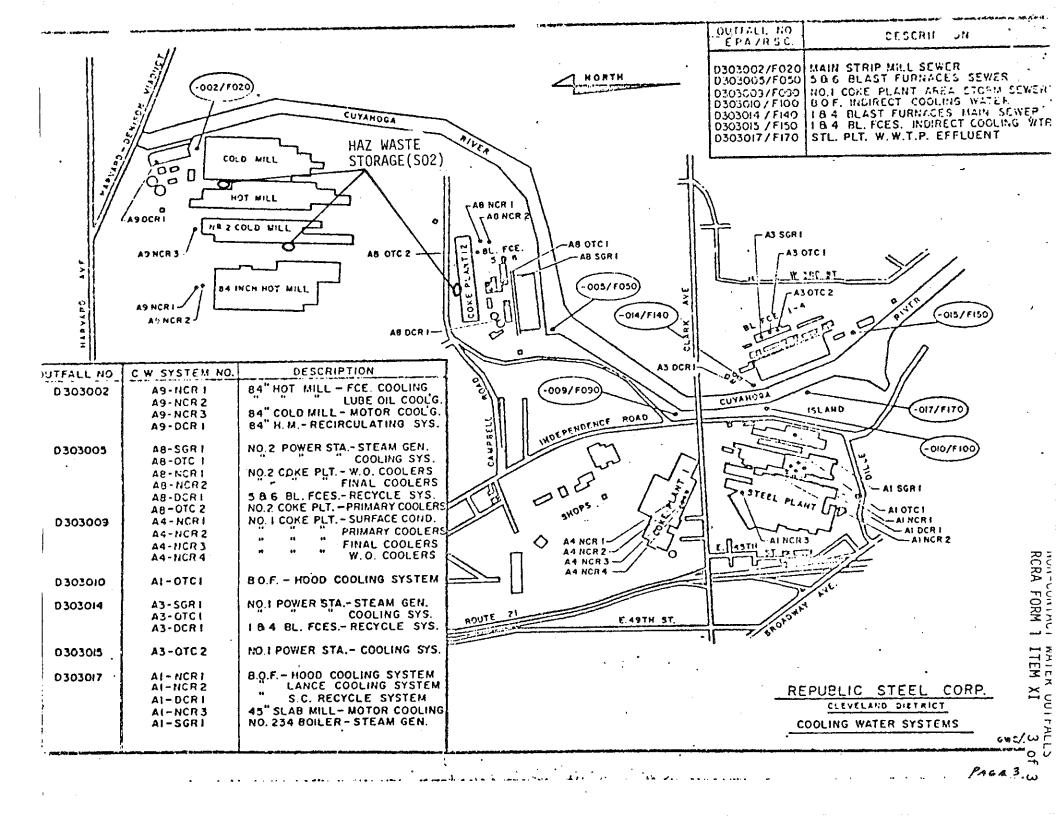
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cc: D.O.

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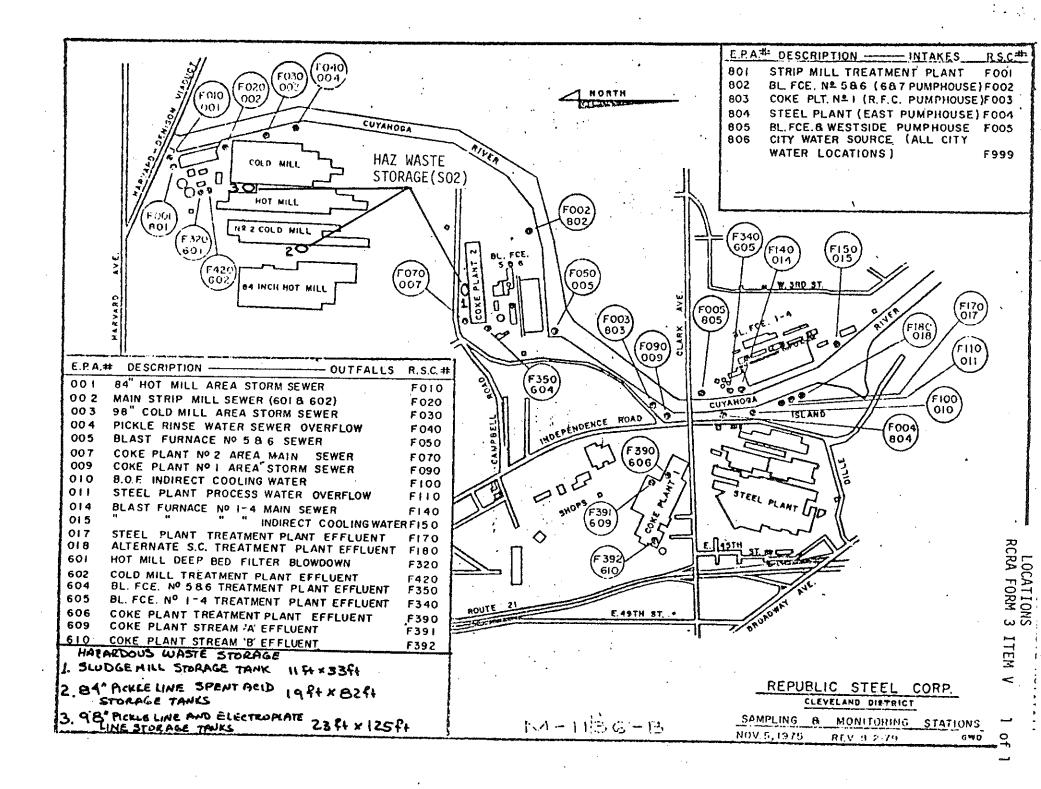
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EPA Form 3510-3 (6-80)

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AW

Republicsteel

Republic Steel Corporation General Offices: Republic Building Environmental Control PO Box 6778 Cleveland OH 44101

October 18, 1982

ال

WL West Director WB Tucker Jr. Assistant to the Director CM Brown Assistant Director—Air

Ohio EPA Division of Hazardous Materials Mgmt. Engineering Section 361 East Broad Street Columbus, OH 43216

Attn: Karen Heyob

Subject: Revised Part A Permit Application

Republic Steel-Cleveland District (HW-0186)

Supplemental Information

The following information is provided as a supplement to information submitted by this office July 26, 1982 and August 6, 1982 regarding an updated RCRA Part A permit application. The revised permit application deletes two waste streams which were reclassified by the agency.

The DHMM Engineering Section requested data which supports the deletion of the coke oven gas desulfurization liquor and sludge. This waste stream was originally identified in the proposed May 19, 1980 regulations as FO16, delisted by U.S. EPA in November 1980, and then reclassified as DO02 by Republic until it could be tested. The material has been analyzed and does not meet the hazardous criteria for corrosivity. Table I contains a summary of the waste analyses performed during 1982.

It is requested that the waste stream deletions be accomplished through an adminstrative change to the existing HWFAB Permit A.

Sincerely,

D. M. Gubanc

Acting Assistant Director Solid Waste Management

DMG:nf

Attach.

cc: Mr. Robert Fragale, HWFAB, Columbus

Mr. David Wertz, OEPA-NEODO

TABLE I

WASTE ANALYSIS OF REPUBLIC STEEL-CLEVELAND DISTRICT COKE OVEN GAS DESULFURIZATION SLUDGE AND LIQUOR-1982

The following waste parameters were determined for Cleveland's coke oven gas desulfurization sludge and liquor shipped off-site for disposal:

Date (1982)	рН	Total So (wt. %	olids Specific Gravity
1-2	9.0	25	1.055
-22	8.0	28	1.055
2-8	9.0	19	1.055
-26	9.0	27	1.050
3-26	8.0	44	1.080
4-14	9.0	43	1.080
5-10	9.0	38	1.065
-26	9.0	32	1.060
6-14	10.0	29	1.060
-25	9.0	49	1.085
7-7	9.0	35	1.080
-19	9.0	13	1.035
-21	9.0		1.070
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-20	8.0	28	1.045
9-9	9.0	32	1.070
-22	8.5	40	1.060
10-1	9.0	13	1.020



Re: Cuyahoga County Hazardous Waste

Permit #02-18-0186

August 13, 1982

Mr. L. Aguier, Superintendent Environmental Control Republic Steel Cleveland District 3100 East 45th Street Cleveland, Ohio 44127

Dear Mr. Aguier:

Your facility has submitted a request to modify the above referenced hazardous waste permit. The technical review of this modification request has been completed and the request forwarded to the Hazardous Waste Facility Approval Board for action. This letter serves to notify you that all facility documents (i.e., closure, contingency, and operating plans) must be revised as needed if the modification request is approved. These documents will be inspected for compliance with all applicable hazardous waste regulations following approval of the modification.

Yours truly,

Paul Flanigan, Manager

Paul Flangon

Engineering Section

Div. of Hazardous Materials Management

PF/maf

Bob Fragale, HWFAB Tom Carlisle, DHMM Paula Cotter, DHMM NEDO-DHMM

> DEGE IVE AUG 17 1982

ENVIRONMENTAL CONTROL DEPT. CLEVELAND DISTRICT

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Republic Steel Corporation General Offices: Republic Building Environmental Control PO Box 6778 Cleveland OH 44101

August 6, 1982

West etor Tucker Jr. stant to the Director . Brown stant Director -- Air

Ms. Peggy Vince Executive Director Hazardous Waste Facility Approval Board 361 E. Broad Street Columbus, Ohio 43216

Subject: Revised Part A Permit Application

Republic Steel-Cleveland District, OHD004218673

81-HW00186

As per requests for additional information from your office, the following is provided.

The copy of the revised Part A permit application dated July 26, 1982 sent to Mr. Wilhelm deleted two waste streams from Section IV of Form 3, "Description of Hazardous Wastes"; F017 and D002. The reason is set forth below:

F017, paint sludges were removed from the list of hazardous waste by U.S. EPA and suubsequently Ohio EPA in 1981. This material does not meet the hazardous waste characteristics.

D002, coke plant desulfurization liquor does not meet the corrosive characteristic of a hazardous waste, and should not appear on the Part A application.

Thank you for your assistance.

D. M. Gubanc

Sr. Solid Waste Management Engineer

DMG/dh

bcc: W. L. West

J. A. McKinney

L. Aguier

J. F. Carter

E. A. Broestl

Icoublicsteel

Republic Steel Corporation General Offices: Republic Building Environmental Control PO Box 6778 Cleveland OH 44101

July 26, 1982

WL West Director WB Tucker Jr. Assistant to the Director CM Brown Assistant Director - Air

Waste Management Branch Air & Hazardous Materials Division U.S. EPA - Region V 230 S. Dearborn St. Chicago, Illinois 60604

Revised Part A Permit Application Subject: Republic Steel Cleveland District - OHD004218673

A revised Part A permit application describing the hazardous waste storage activities performed at the Republic Steel Cleveland District facility, located in Cleveland, Ohio is attached. This permit application updates the activities described in the Part A permit application dated November 17, 1980. No facilities are being expanded or replaced. The revised Part A reflects regulatory and operational changes that have occurred since the original Part A was filed.

A copy of this revised permit application is being sent to Ohio EPA.

Please contact this office concerning questions about the content of the permit application (216/622-5916).

Sincerely,

D. M. Gubanc

Sr. Solid Waste Management Engineer

DMG:nf

cc: Chief, Division of Hazardous Materials Management - Ohio EPA - w/att.

bcc: Messrs. J. F. Carter L. Aguier - w/att.

W. C. Mozes

T. M. Girdler

J. A. McKinney

W. L. West

E. A. Broestl

E. Majesky

All without attachments except as noted

Tcnublicsteel

Republic Steel Corporation
General Offices: Republic Building
Environmental Control
PO Box 6778
Cleveland OH 44101

July 26, 1982

WL West Director WB Tucker Jr. Assistant to the Director CM Brown Assistant Director—Air

Mr. Charles Wilhelm Chief, Division of Hazardous Materials Management Ohio EPA 361 E. Broad Street Columbus, OH 43216

Subject: Revised Part A Permit Application

Republic Steel Cleveland District - OHD004218673

A copy of a revised Part A permit application, dated July 26, 1982, sent to U.S. EPA is attached for information. This revised Part A does not propose to change Republic Steel's Ohio HWFAB permit conditions and merely reflects the present operations performed at that facility.

If you have questions, please contact this office (216/622-5916).

Sincerely,

D. M. Gubanc

Sr. Solid Waste Management Engineer

Dis M Gabane

DMG:nf

Attach.

cc: U.S. EPA Region V, Waste Management Branch Air and Hazardous Materials Division

bcc: Messrs. W. L. West

J.F. Carter L. Aguier

T. M. Girdler

W. C. Mozes

J. A. McKinney

E. A. Broestl

republicsteel

Republic Steel Corporation General Offices: Republic Building Environmental Control PO Box 6778 Cleveland OH 44101

August 6, 1982

WL West Director WB Tucker Jr. Assistant to the Director CM Brown Assistant Director—Air

Ms. Peggy Vince Executive Director Hazardous Waste Facility Approval Board 361 E. Broad Street Columbus, Ohio 43216

Subject: Revised Part A Permit Application

Republic Steel-Cleveland District, OHD004218673

81-HW00186

As per requests for additional information from your office, the following is provided.

The copy of the revised Part A permit application dated July 26, 1982 sent to Mr. Wilhelm deleted two waste streams from Section IV of Form 3, "Description of Hazardous Wastes"; F017 and D002. The reason is set forth below:

FO17, paint sludges were removed from the list of hazardous waste by U.S. EPA and suubsequently Ohio EPA in 1981. This material does not meet the hazardous waste characteristics.

D002, coke plant desulfurization liquor does not meet the corrosive characteristic of a hazardous waste, and should not appear on the Part A application.

Thank you for your assistance.

D. M. Gubanc

Sr. Solid Waste Management Engineer

DMG/dh

bcc: W./L. West

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ENVIRONMENTAL CONTROL DEPT.
CLEVELAND DISTRICT

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L UNIT OF MEASURE -	For each quantity entered	In column B	enter the unit of	measure code. U	nits of measure which must be used and the appropriate .
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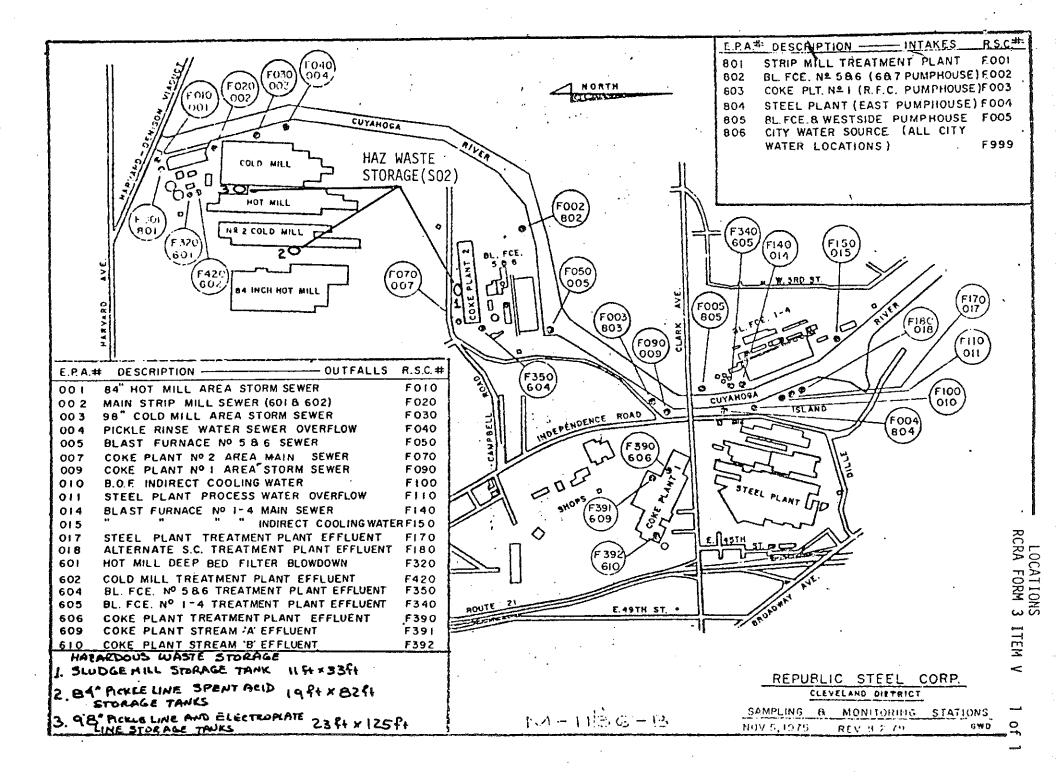
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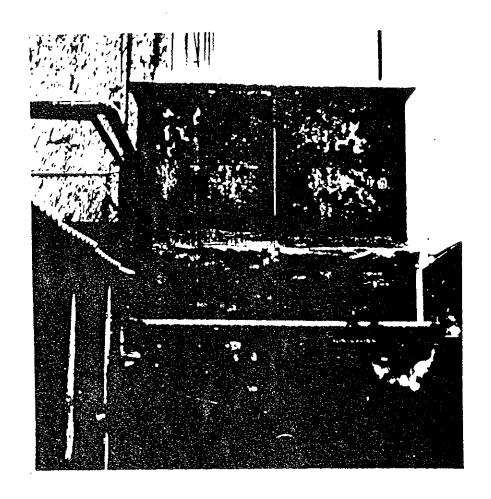
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FACILITY DRAWING All existing facilities must include in the space provided on page 1.	page 5 a scale dra	awing of the facility (see instructions for	or more detail).	
VI. PHOTOGRAPHS	ISH HOLES			
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III. FACILITY GEOGRAPHIC LOCATION	A CONTRACTOR			
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VIII. FACILITY OWNER A. If the facility owner is also the facility operator as	Unted in Section	VIII on Form 1, "General Information	n", place an "X"	in the box to the left and
A. If the facility owner is also the facility operator as skip to Section IX below.	inten in poerior.			
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IX. OWNER CERTIFICATION I certify under penalty of law that I have personally documents, and that based on my inquiry of those are horized information is true, accurate, and complete the complete that information is true, accurate, and complete the complete that information is true, accurate, and complete the complete that information is true, accurate, and complete that information is true, accurate the complete that information is true, accurate the complete that information is true, accurate the complete that information is true, accurate the complete that information is true, accurate the complete that information is true, accurate the complete that information	y examined an individuals im lete. I am awar	d am familiar with the information	s.sr.	this and all attached
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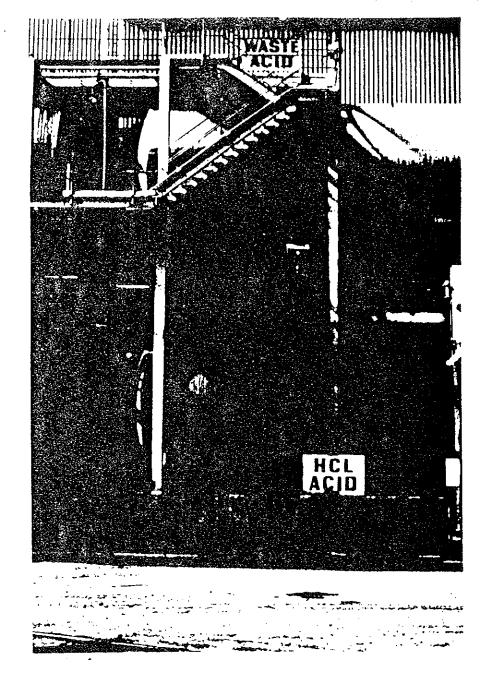
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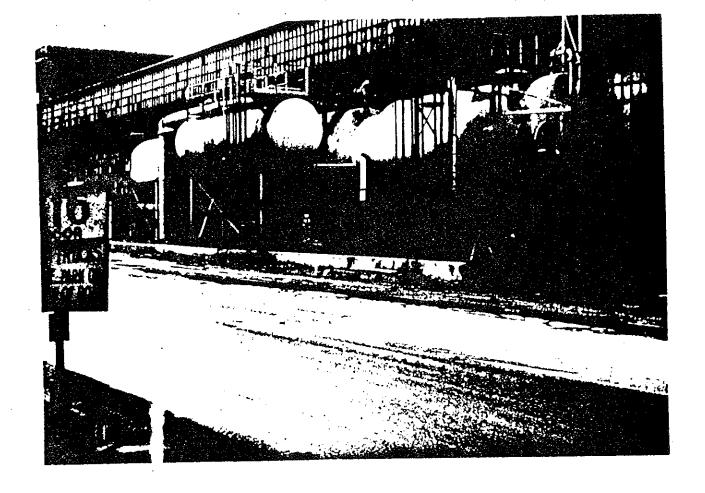




REPUBLIC STEEL-CLEVELAND DIST. SLUDGE MILL STORAGE TANK (SO2) RCRA FORM 3 ITEM YI 1 of 3



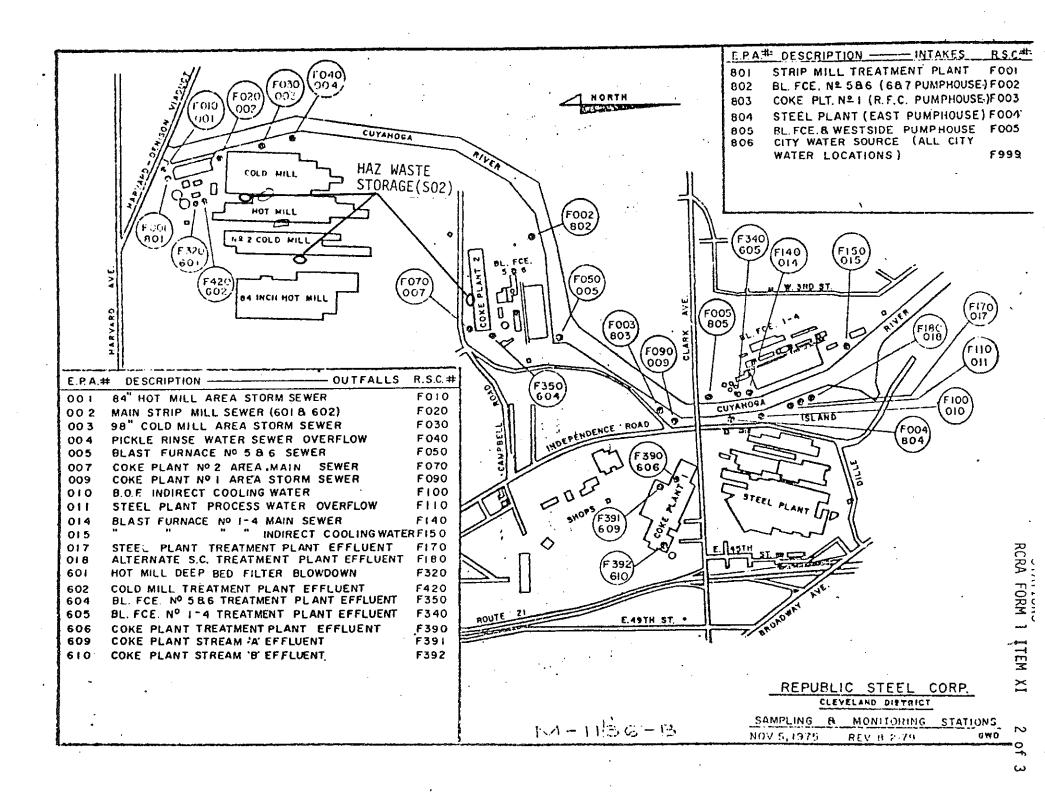
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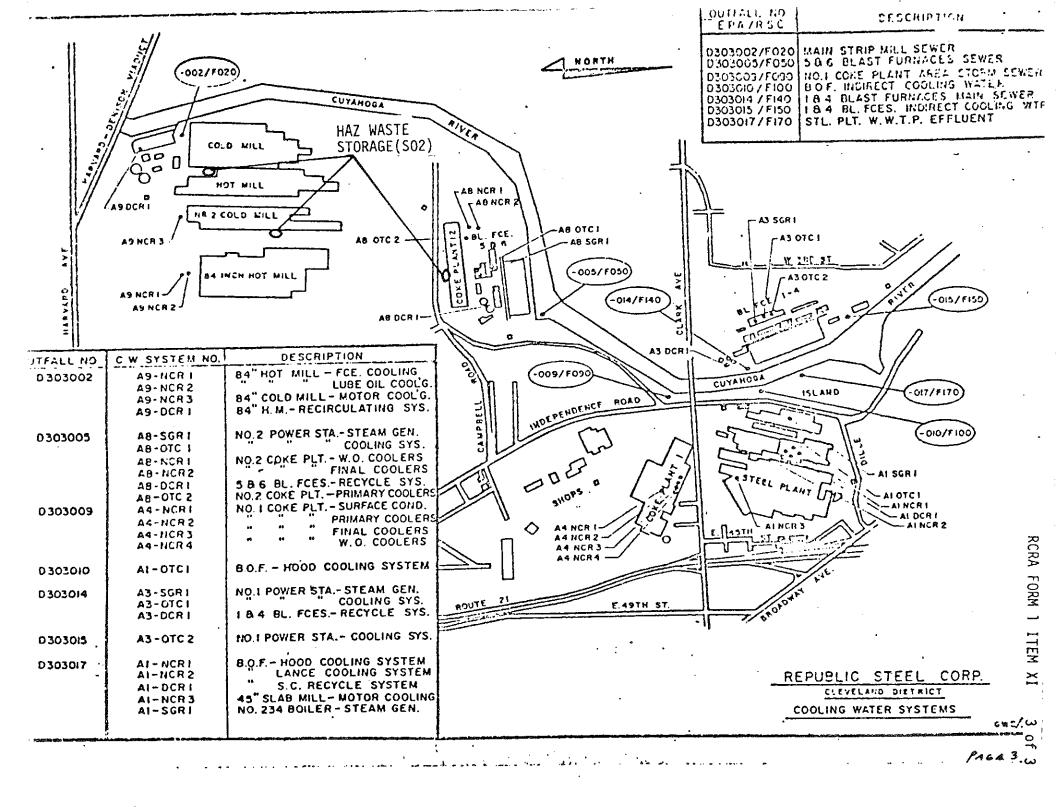


REPUBLIC STEEL-CLEVELAND DIST.
98" AND ELECTROPLATE LINE
STORAGE TANKS (SO2)
RCRA FORM 3 ITEM VI 3 of 3



REPUBLIC STEEL-CLEVELAND DIST. TOPOGRAPHIC MAP AND FLOOD PLAIN RCRA FORM 1 ITEM XI 1 of 3





STATE OF OHIO

HAZARDOUS WASTE FACILITY APPROVAL BOARD

In the Matter of:

Republic Steel Cleveland District 3100 East 45th Street Cleveland, Ohio 44127

Applicant/Permittee

The operator of the belowreferenced hazardous waste facility

Republic Steel Cleveland District 3100 East 45th Street Cleveland, Ohio 44127

Facility

ACCORDER TO BE A TRUE AND ACCORDED TO BE A TRUE AND ACCORDED TO F OF THE OFFICIAL DOCUMENT AS FILED IN THE RECORDS OF THE OHIO HAZARDOUS WASTE FACILITY APPROVAL BOARD

Permit No. 02-18-0186

HAZARADOUS WASTE FACILITY.

APPROVAL BOARD

DEC 28 1981

ENTERED SOURCE SOURCE

Pursuant to Section 3734.05(D) of the Revised Code, The Hazardous Waste Facility Approval Board (Board) makes the following Findings and Conclusions and Issues a Hazardous Waste Facility Installation and Operation Permit (Permit)

FINDINGS AND CONCLUSIONS

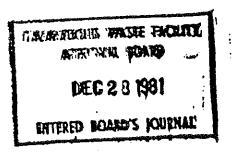
- 1. The Applicant has submitted to the Board a completed permit application, stating the facility was in operation immediately prior to October 9, 1980, and has paid the required permit fee.
- 2. The Ohio Environmental Protection Agency (Agency) and/or the United States Environmental Protection Agency has inspected the facility and has prepared an Interim Status Standards Survey (survey).
- 3. All public comments timely received have been reviewed, evaluated and considered by the Board and the Agency for their relevancy and materiality.
- 4. The Agency has reviewed and considered the information on the permit application, the results of the survey, the public comments, and other pertinent material and has concluded that the facility was in substantial compliance, as determined by the Director of Environmental Protection, with applicable statutes and rules in effect immediately prior to October 9, 1980.

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- 5. The Agency has informed the Applicant of the requirements of applicable hazardous waste rules of which it was not in compliance.
- 6. The Agency has recommended to the Board that a permit be issued to the facility.
- 7. Review and consideration of the information on the permit application, the results of the survey, the public comments, recommendations and comments by the Agency, and other pertinent material regarding the Applicant and the facility is sufficient to determine whether the facility meets the requirements for permit issuance set forth in Section 3734.05(D) of the Revised Code.
 - 8. The staff of the Board has reviewed and considered the information on the permit application, the results of the survey, the public comments, the recommendation and comments by the Agency, and other pertinent material regarding the Applicant and the facility and has recommended to the Board that a permit be issued.
 - 9. Pursuant to Resolution No. 141-81, passed October 1 , 1981, the Board found that the facility:
 - a. Was in operation immediately prior to October 9, 1980,
 - b. Was in substantial compliance, as determined by the Director of Environmental Protection, with applicable statutes and rules in effect immediately prior to October 9, 1980,
 - c. Submitted a completed permit application, and
 - d. Has demonstrated to the Board that its operation after October 9, 1980 will comply with applicable performance standards adopted by the Director of Environmental Protection pursuant to division (D) of Section 3734.12 of the Revised Code.
 - 10. Pursuant to such Resolution, the Board resolved and approved that a permit be issued with such standard terms and conditions set forth in the document entitled "Terms and Conditions" attached to the Resolution and such special terms and conditions as were approved by the Board.
 - 11. The terms and conditions referenced in Finding Number 10 above, are attached hereto and incorporated herein.
 - 12. Resolution No. 21-81, passed on August 26, 1981 and entered into the Journal of the Board on September 1, 1981, authorizes the Coordinator of the Board to:

I CERTIFY THIS COPY TO BE A TRUE AND ACCURATE COLY OF THE OFFICIAL DOCUMENT AS FILED IN THE RECORDS OF THE OHIO HAZARDOUS WASTE FACILITY APPROVAL BOARD

BY _____ DATE _12/31/81



- a. Authorize the staff of the Board to issue to the facilities the Hazardous Waste Facility Installation and Operation Permits approved for issuance by resolution of the Board, and
- b. Have signing authority indicating that such action has been approved by the Board.

NOW THEREFORE, A HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT IS ISSUED TO THE Applicant for the facility, subject to the Terms and Conditions attached hereto and incorporated herein.

FOR THE BOARD, BY ORDER OF THE BOARD

Diggy J. Vince December 37, 1981

Entered into the Journal of the Board on Decade __, 1981 by

Madeline Somson/sec

I CERTIFY THIS COPY TO BE A TRUE AND ACCURATE COPY OF THE OFFICIAL DOCUMENT AS FILED IN THE RECORDS OF THE OHIO HAZARDOUS WASTE FACILITY APPROVAL BOARD

HAZARADOUS WASTE FACILITY
APPROVAL BOARD

DEC 28 1981

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Republic Steel Corporation General Offices: Republic Building Environmental Control PO Box 6778 Cleveland OH 44101

July 26, 1982

WL West Director WB Tucker Jr. Assistant to the Director CM Brown Assistant Director—Air

Waste Management Branch Air & Hazardous Materials Division U.S. EPA - Region V 230 S. Dearborn St. Chicago, Illinois 60604

Subject: Revised Part A Permit Application

Republic Steel Cleveland District - OHD004218673

A revised Part A permit application describing the hazardous waste storage activities performed at the Republic Steel Cleveland District facility, located in Cleveland, Ohio is attached. This permit application updates the activities described in the Part A permit application dated November 17, 1980. No facilities are being expanded or replaced. The revised Part A reflects regulatory and operational changes that have occurred since the original Part A was filed.

A copy of this revised permit application is being sent to Ohio EPA.

Please contact this office concerning questions about the content of the permit application (216/622-5916).

Sincerely,

D. M. Gubanc

Sr. Solid Waste Management Engineer

DMG:nf

cc: Chief, Division of Hazardous Materials
Management - Ohio EPA - w/att.

bcc: Messrs. J/F. Carter

∠C. Aguier - w/att.

W. C. Mozes

T. M. Girdler

J. A. McKinney

W. L. West

E. A. Broestl

E. Majesky

All without attachments except as noted

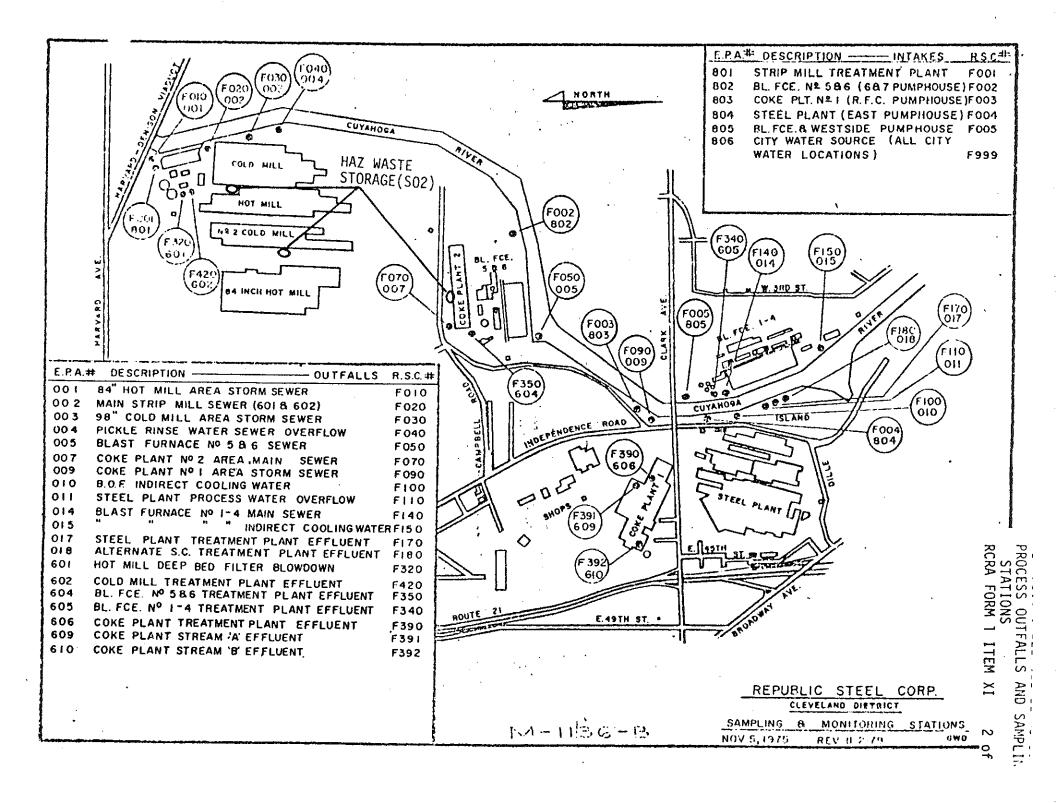
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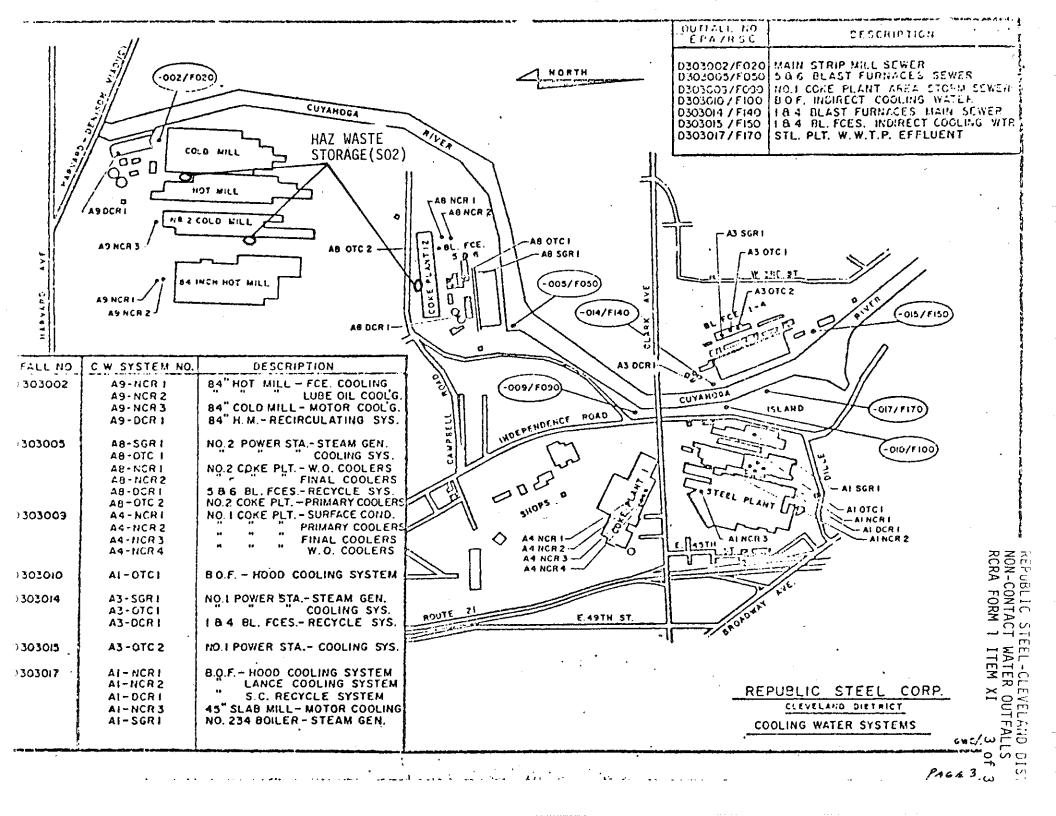
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C. STATUS OF OPERATOR (Enter the appropriate letter into the an	twer box; if "Other"	', specify.)	D. PHONE (	rea code & no.)
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attach to this application a topographic map of the area extending the outline of the facility, the location of each of its existing an	ig to at least one r d proposed intak	nue beyond pro e and discharge	operty bounderies. To structures, each of i	ne map must show ts hazardous waste
treatment, storage, or disposal facilities, and each well where it	injects fluids und	erground. Inclu	de all springs, rivers	and other surface
water bodies in the map area. See instructions for precise requirements	nents.	and the second second		
(III. NATURE OF BUSINESS (provide a brief description)			SASTE DINGS.	
Integrated Steel Plant producing plate; z	inc coated s	heets and	coil; bar pro	ducts;
hot-rolled sheet, coil and strip; cold ro	lled sheets,	coil and	strip; coke p	lant
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(III. CERTIFICATION (see instructions)		en en en en en en en en en en en en en e	SHE SHE SHE SHE	
I certify under penalty of law that I have personally examined a	nd am familiar wi	th the informat	tion submitted in thi	s application and all
attachments and that based on my inquiry of those persons	immediately resp	onsible for obta	aining the information	on contained in the
application, I believe that the information is true, accurate and false information, including the possibility of fine and imprisonm	complete, I am a ent.	ware that then	•	
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#### STATE OF OHIO

## HAZARDOUS WASTE FACILITY APPROVAL BOARD

In the Matter of:

Republic Steel Cleveland District 3100 East 45th Street Cleveland, Ohio 44127

Applicant/Permittee

The operator of the belowreferenced hazardous waste facility

Republic Steel Cleveland District 3100 East 45th Street Cleveland, Ohio 44127

Facility

A CORCES OF THE CHICAL DOCUMENT AS FILED IN THE RECORDS OF THE OHIO HAZARDOUS WASTE FACILITY APPROVAL BOARD

BY _____ DATE __12/31/8/_

Permit No. 02-18-0186

HAZARADOUS WASTE FACILITY,
APPROVAL BOARD

DEC 28 1981

ENTERED SOARD'S SOURNAL

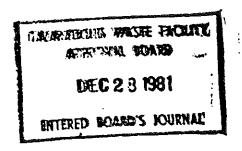
Pursuant to Section 3734.05(D) of the Revised Code, The Hazardous Waste Facility Approval Board (Board) makes the following Findings and Conclusions and issues a Hazardous Waste Facility Installation and Operation Permit (Permit)

## FINDINGS AND CONCLUSIONS

- The Applicant has submitted to the Board a completed permit application, stating the facility was in operation immediately prior to October 9, 1980, and has paid the required permit fee.
- The Ohio Environmental Protection Agency (Agency) and/or the United States Environmental Protection Agency has inspected the facility and has prepared an Interim Status Standards Survey (survey).
- All public comments timely received have been reviewed, evaluated and considered by the Board and the Agency for their relevancy and materiality.
- 4. The Agency has reviewed and considered the information on the permit application, the results of the survey, the public comments, and other pertinent material and has concluded that the facility was in substantial compliance, as determined by the Director of Environmental Protection, with applicable statutes and rules in effect immediately prior to October 9, 1980.

- The Agency has informed the Applicant of the requirements of applicable hazardous waste rules of which it was not in compliance.
- 6. The Agency has recommended to the Board that a permit be issued to the facility.
- 7. Review and consideration of the information on the permit application, the results of the survey, the public comments, recommendations and comments by the Agency, and other pertinent material regarding the Applicant and the facility is sufficient to determine whether the facility meets the requirements for permit issuance set forth in Section 3734.05(D) of the Revised Code.
  - 8. The staff of the Board has reviewed and considered the information on the permit application, the results of the survey, the public comments, the recommendation and comments by the Agency, and other pertinent material regarding the Applicant and the facility and has recommended to the Board that a permit be issued.
  - 9. Pursuant to Resolution No. 141-81, passed October 1 , 1981, the Board found that the facility:
    - a. Was in operation immediately prior to October 9, 1980,
    - b. Was in substantial compliance, as determined by the Director of Environmental Protection, with applicable statutes and rules in effect immediately prior to October 9, 1980,
    - c. Submitted a completed permit application, and
    - d. Has demonstrated to the Board that its operation after October 9, 1980 will comply with applicable performance standards adopted by the Director of Environmental Protection pursuant to division (D) of Section 3734.12 of the Revised Code.
  - 10. Pursuant to such Resolution, the Board resolved and approved that a permit be issued with such standard terms and conditions set forth in the document entitled "Terms and Conditions" attached to the Resolution and such special terms and conditions as were approved by the Board.
  - 11. The terms and conditions referenced in Finding Number 10 above, are attached hereto and incorporated herein.
  - 12. Resolution No. 21-81, passed on August 26, 1981 and entered into the Journal of the Board on September 1, 1981, authorizes the Coordinator of the Board to:

I CERTIFY THIS COPY TO BE A TRUE AND ACCURATE COLL OF THE OFFICIAL DOCUMENT AS FILED IN THE RECORDS OF THE OHIO HAZARDOUS WASTE FACILITY APPROVAL BOARD



- a. Authorize the staff of the Board to issue to the facilities the Hazardous Waste Facility Installation and Operation Permits approved for issuance by resolution of the Board, and
- b. Have signing authority indicating that such action has been approved by the Board.

NOW THEREFORE, A HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT IS ISSUED TO THE Applicant for the facility, subject to the Terms and Conditions attached hereto and incorporated herein.

FOR THE BOARD, BY ORDER OF THE BOARD

Diggy Q. Vince Ocember 27, 1981

Entered into the Journal of the Board on Decate __, 1981 by

Madeline Samson/sec

I CERTIFY THIS COPY TO BE A TRUE AND ACCURATE COPY OF THE OFFICIAL DOCUMENT AS FILED IN THE RECORDS OF THE OHIO HAZARDOUS WASTE FACILITY APPROVAL BOARD

HAZARADOUS WASTE FACILITY
APPROVAL BOARD

DEC 28 1981

ENTERED BOARD'S JOURNAL

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# **Republic**steel

Republic Steel Corporation General Offices: Republic Building Environmental Control PO Box 6778 Cleveland OH 44101

November 17, 1980

WL West P. Director Ch
WB Tucker Jr.
Assistant to the Director
LF Birkel Su
Assistant Director—Water
CM Brown

Assistant Director-Air

Administrator
Environmental Procedures

JB Bailey

EPA Region V RCRA Activities P.O. Box 7861 Chicago, IL. 60680

Subject: Hazardous Waste Permit

Part A Application Submittal

In accordance with the Hazardous Waste Management Regulations authorized under the Resource Conservation and Recovery Act, the following Hazardous Waste Treatment/Storage/Disposal Facility permit Part A applications are attached.

2. 3. 4. 5. 6.	Republic Steel Republic Steel Republic Steel Republic Steel Republic Steel Republic Steel	Chicago District Central Alloy District-Canton Central Alloy District-Massillon Cleveland District Enduro Division Canton South Enduro Division Massillon Mahoning Valley District Warren	ILD056623598 OHD004228003 OHD066034729 OHD004218673 OHD004447322 OHD990834129 OHD060409521
8.	Republic Steel	Mahoning Valley District-	A. A. B. T A
	Youngstown		No No. Assigned
9.	Republic Steel Division	Manufacturing Grp. Ind. Prod.	No No. Assigned

Sincerely,

D.M. Gebone

D. M. Gubanc Solid Waste Management Engineer

DMG/dh

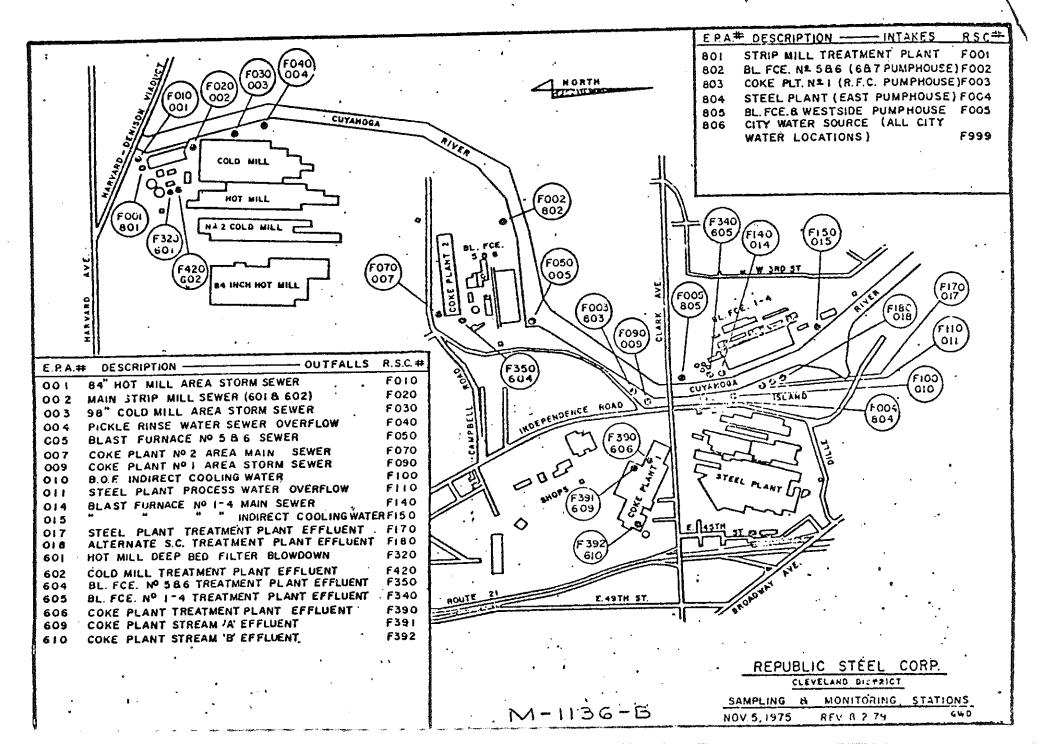
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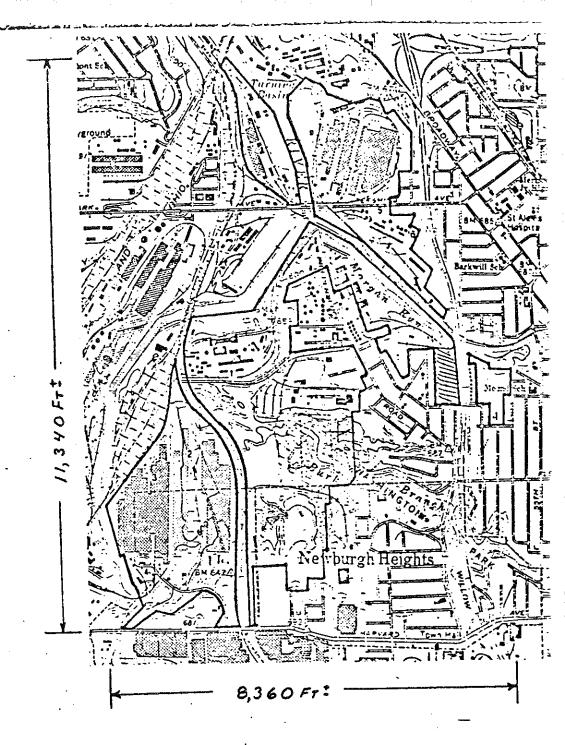
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C. STATUS OF OPERATOR (Enter the appropriate letter into the answer	box; if "Other", specify.)  D. PHONE (area code & no.)
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P = PRIVATE  E, STREET OR P.O. BOX	
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The second and the second on my inquiry of those persons im	mediately responsible for obtaining the information contained in the
application, I believe that the information is true, accurate and co- felse information, including the possibility of fine and imprisonment	omplete. I am aware that there are significant penalties for submitting of.
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P. N. WIGTON, Vice President	made: 1
Steel Operations 1/	M: 1 earth 11-17-80
COMMENTS FOR OFFICIAL USE ONLY	
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REPUBLIC STEEL CORPORATION Cleveland District (See BLACK outlined area.) EUCLIE 10 MI VICLEVELAND NORTHI 43 40' Sterling Sel ř. 90 / P TEC ВM co ch Newburgh Heights

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- 3 98° PICHLER SPIENT PICHLE LIQUOR TANKS AREA 23'x 125':
- 4 PICHLE RINSE WATER NEUTRALIZATION & OXIDATION TANN ARRA 68'x19':
- 5 COME OURU GAS DESULEURIZATION:

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FORM 1 Item I A of 4

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C. SPACE FOR ADDITIONAL PROCESS CODE:	OR FOR DESCRIBING OTHE	R PROCESSES (code "TO4"	"). FOR EACH PROCE	SS ENTERED HERE
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rv	. DESCRIPTION OF HAZARDOUS WASTES
Ā.	PA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you
	handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that weste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste/s/ that will be handled, which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column 8 enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
TONS.	P	KILOGRAMS	
TONS.	T	METRIC TONS	

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

#### D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code/s/ from the first of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous westes: For each characteristic or toxic contaminant entered in column A, select the code/s/ from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous westes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes, if more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER -- Hezardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns 8,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treet, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

ш	H.	Ą.,				5		UN													D. PROCESSES
	W A (er	45	TE	Ν	이	B. ESTIMATED ANNUAL QUANTITY OF WASTE		en te	E				1. 1	PRC		:38 :(#)		OES	3		2. PROCESS DESCRIPTION (If a code is not entered in D(1))
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3	D	0	1	7	2	400		P		T	0	3	D	8	0	,	1	1	7	1	1
X-3	D	0	7	,	1	100	1	P		T	0	3	D	8	0	1	-	1		1	•
X-4	D	0	)	,	2						Γ	T		Т	1		T	1	ī	1	included with above

otocopy this page before completing if you have more than 26 wastes to list. Form Approved OMB No. 158-580004 FOR OFFICIAL USE ONLY EPA I.D. NUMBER (enter from page 1) W 4 6 8 DUP DUP IV. DESCRIPTION OF HAZARDOUS WASTES (continued) C. UNIT OF MEA-SURE (enter code) D. PROCESSES A. EPA HAZARD. WASTENO B. ESTIMATED ANNUAL QUANTITY OF WASTE 1. PROCESS CODES (enter) 2. PROCESS DESCRIPTION (If a code is not entered in D(I)) (enter code) 19 17 - 19 17 10 Recycled on coal to coke batter T S 0 2 11 Ю. U using sludge mill 5 0 2 T 15 0 3 2 11 Ħ P S 0 2 290 Ю 3 1 5 0 2 T 8 4,140 S 0 2 T 5 53,500 10 6 501502 Coke Oven Gas Desulfurization 300 T 6 D 0 0 <del>Sludge and Liquor.</del> Coke Plant Waste Ammonia Liquor T T 0 1 2 7 D 10 0 388,355 Strip Mill Pickle Rinse Water T 8 887,230 T 0 1 ol ol d 2 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

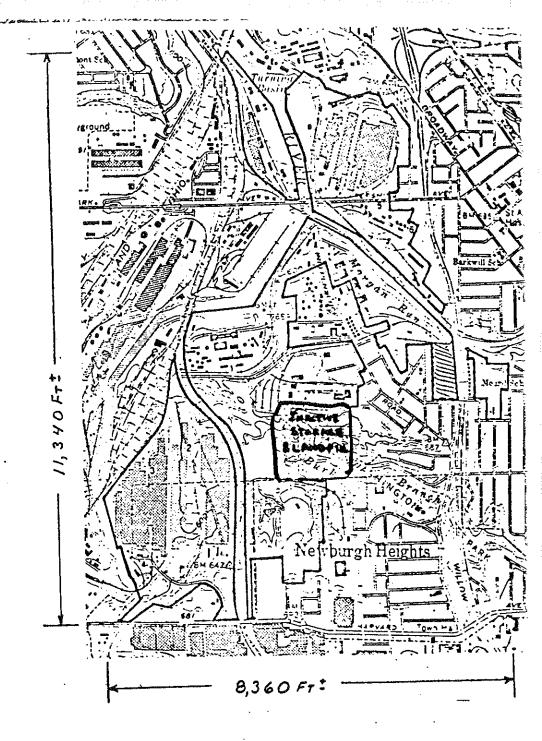
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EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

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EFA 1.D. NO. (enter from page 1)				
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FACILITY DRAWING			for more del	
Il existing facilities must include in the space provided	On page 3 a scale drawin.	g of the facility isee instructions		
I. PHOTOGRAPHS All existing facilities must include photographs (a		(Lebas clearly delineate all ex	istina struc	tures: existing storage,
reatment and disposal areas; and sites of future s	storage, treatment of	disposal areas (see instruction	ns for more	detail).
II. FACILITY GEOGRAPHIC LOCATION				inutes, & seconde)
LATITUDE (degrees, minutes, & seco	nde)	20147.001		
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A. If the facility owner is also the facility operator skip to Section IX below.				"X" in the box to the left and
B. If the facility owner is not the facility operator	as listed in Section VIII	on Form 1, complete the follow	ving items:	
I. NAME OF FACILITY'S LEGAL OWNER				Z. PHONE NO. (area code & no.)
	·			
2. STREET OR P.O. BOX		4. CITY OR TOWN	\$	
	흡			
	G		19 11	
IX. OWNER CERTIFICATION		familiac with the information	on submitte	d in this and all attached
I certify under penalty of law that I have person documents, and that based on my inquiry of the	ially examineo and all ose individuals immed	liately responsible for obtaini	ing the info	rmation, I believe that the
withmitted information is true, accurate, and con	Ubista' i am amora m	at there are significant penalt	ties for subt	nitting raise intormation,
including the possibility of fine and imprisonme	nt.			DATE SIGNED
a second (ampline type)	8. SIGNATURE		ŀ	
^ p^mn wigton. Vice President			1	
P. N. WIGTON, Vice President Steel Operations	TPM:	Stiston	, ]	1-17-80
Steel Operations		with the sale of the sale of the sales	44	of Charles and described and to the de-
X. OPERATOR CERTIFICATION  I certify under penalty of law that I have person documents, and that based on my inquiry of the submitted information is true, accurate, and co	nally examined and allose individuals immedianplete. I am aware th	m familial with the informati	ion submitt	ed in this and all attached permation. I believe that the
X. OPERATOR CERTIFICATION  I certify under penalty of law that I have person documents, and that based on my inquiry of the submitted information is true, accurate, and coincluding the possibility of fine and imprisonments.	nally examined and an nose individuals immed implete. I am aware thent.	m familiar with the informati diately responsible for obtain hat there are significant penal	ion submitt ing the info ties for sub	ed in this and all attached permation. I believe that the
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E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(I) ON PAGE 3.

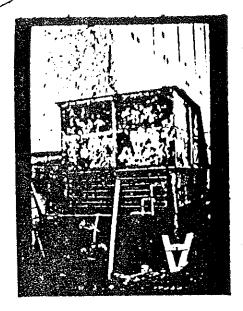


- 1 Shugge MILL 11'x 33'=
- 2 84" PICHLER SPENT PICHLE LIQUOR TANHS ARRA 19'X 82' :
- 3 98° PICHLAR SPIENT PICHLE LIQUOR TANKS AREA 23'x 125':
- 4 PICKLE RINSE WATER NEUTRALIZATION & OXIDATION TANK ARRA 68'x17':
- 5 CORE OVEN GAS DESULEURIZATION:

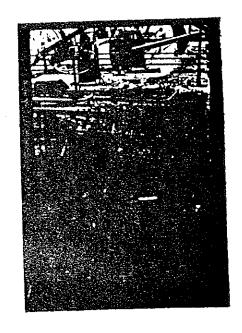
  DISPOSAL SUMP 12'X 9'S

  A DAIM STORAGE RAGE 21' X 9'S
- 6 CONF PLANT WATER TREATMENT PLANT 182' X 135'

FORMS ITEM I (PARLIEF



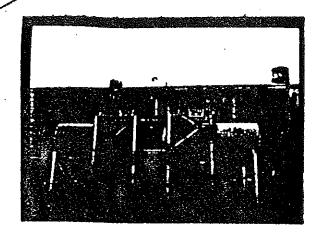
SLUDGE MILL STORAGE



COME OVEN GAS DESULFURIZATION
DISPOSAL SUMP



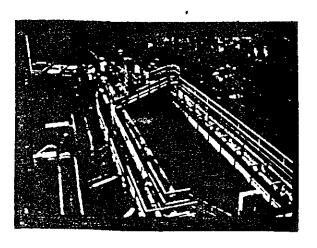
DRUM STORAGE AREA



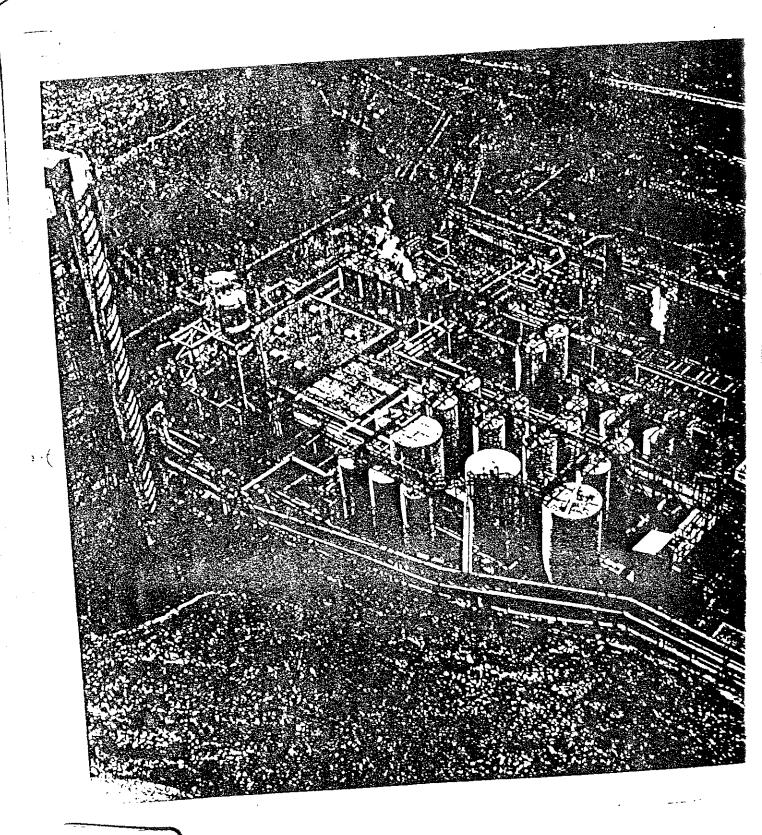
84° PICHLAR" SPENT PICHER LIQUOR STORAGE TANK



.98" PICKLER SPENT PICHLE LIQUOR STORAGE TANKS



PICHLE RINSE WATER
NEUTRALIZATION AND
OXIDATION TANK



1081

- LIMENT PLANT

Sees

## ATTACHMENT C

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Please refer to the Instructions for Filling Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation

# Notification of Regulated Waste Activity

Date Received (For Official Use Only)

end Recovery Act).  United States Environmental Protection Agency
L Installation's EPA ID Number (Mark 'X' in the appropriate box)
A. First Notification X (Complete Item C)  C. Installation's EPA ID Number (Complete Item C)  O H D O O 4 2 1 8 6 7 3
II. Name of Installation (Include company and specific site name)
LTVSTEELCOMPANY CLEVE EAST
III. Location of Installation (Physical address not P.O. Box or Route Number)
Street
3 1 0 0 E A S T 4 5 S T R E E T
Street (Continued)
City or Town
C L E V E L A N D   O H 4 4 1 2 7
County Code County Name
O 1 8 CU Y A H O G A
IV. Installation Mailing Address (See Instructions)
Street or P.O. Box
S A M E Slate Zip Code
City or Town Slate Zip Code Zip Code
V. Installation Contact (Person to be contacted regarding waste activities at site)
Name (Last)
N E M E T H R I C H A R D Phone Number (Area Code and Number)
300 time
MANAGERENVIRON216-429-6370
VL Installation Contact Address (See Instructions)  A Contract Address Location Malling Other B. Street or P.O. Box
A. Contract Address Location Malling Other B. Street or P.O. Box
City or Town )
City or Town 19 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
VII. Ownership (See Instructions)
A Name of Installation's Legal Owner
3 1 0 0 E A S T 4 5 S T R E E T Zip Code
C L E V E L A N D  B Land Type C. Owner Type D. Change of Owner Changed Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Company Compan
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ı	. N. 20 - 1	J - Por	OTHER	Jse Only ·	• • • •	
	3 33 1				73 5	
II. Type of Regulated Waste Activity (Mark X in the appropriate boxes; Refe	r to Instructio	on <b>s)</b>				
A. Hazardous Waste Activity	18-32 L		d Oil Re	cycling Ac	ctivities	
Generator (See Instructions)  a. Greater than 1000kg/mo (2,200 lbs.)  b. 100 to 1000 kg/mo (200-2,200 lbs.)  c. Less than 100 kg/mo (220 lbs.)  Transporter (Indicate Mode in boxes 1-5 below)  a. For own waste only b. For commercial purposes  Mode of Transportation  1. Air 2. Rail 3. Highway 4. Water 5. Other - specify  Transporter (Indicate Mode in boxes 1-5 to below)  1. Air 2. Rail 3. Highway 4. Water 5. Other - specify  Treater, Storer, Dispose Installation) Note: A per installation (Instructions) (Instructions)  Required for this activity instructions.  4. Hazardous Waste Fuel 5. Other Marketers 6. Believand/or Industrial Fuel 7. Small Quantity Exert (Indicate Type of Combinations)  1. Air 2. Rail 3. Highway 4. Water 5. Other - specify  Device(s) 5. Underground injection Combined in the cassary)  X. Description of Hazardous Wastes (Use additional sheets if necessary)	mit is y; see 22 Burner 22 WX 33 watton 44 watton	a. Marking of the barking of the bar	off-Speeter Who leets the life Burner stion Devy Boller strial Boi strial Fundi Transpity(les) sporter sfer Facili Process of Activiess	cts Shipme cification B First Claim Specification - Indicate ice(s) ier nace orter - Indicate ity sor/Re-refin ty(les)	turner ins the Us ons 5 Type(s)	sed ) of e(s)
A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 [gnitable 2 Corrosive 2 Reactive 4 Toxicity (List specific EPA hazardox X X X X D D 0 0 6 ]  3. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See Instructions If your first the boxes of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the contro	D 0 0	7 D	Toxichy of 0 0 12 waste	wacterlette co	00	(1) 9
X. Certification  Leartify under penalty of law that this document and all attachments were prepared system designed to assure that qualified personnel property gather and evaluate the or persons who manage the system, or those persons directly responsible for gather best of my knowledge and belief, true, accurate, and complete. Lam aware that there	under my dir information suring the loter	ection or ubmitted.	r supervis Based or he inform	ion in according to my inquiry attorn submit	dance wi	the
Signature  Name and Official Title (T)  R. W. WILLIAMS, GEN  XI. Comments	pe or print) ERAL MAN	AGER		Date Sign	ed 5	
Note: Mall completed form to the appropriate EPA Regional or State Office. (See	Section III of	the book	det for ad	dresses.)		

LTV Steel Company

tile per some in

September 10, 1991

SEP 13 1991

Mr. Gary Victorine (5HR-13) U. S. EPA, Region 5 230 S. Dearborn Street Chicago, Illinois 60604 ENVIRONMENTAL CON LC DOTA GULVELAND DICTA OF

Re: BIF Rule Notification Response LTV Steel Company, Inc. Cleveland, Ohio OHD 004 218 673

Dear Mr. Victorine:

This correspondence is in response to an undated BIF Rule letter, signed by William E. Muno, received by this facility on August 14, 1991. The most recent "subsequent notification" of hazardous waste activities for the above facility was submitted to U. S. EPA in April 1987. This notification was acknowledged by the agency on May 15, 1989. Copies of both documents are attached.

LTV Steel burns Specification and Off-Specification Used Oil fuel in industrial furnaces. As no hazardous wastes or hazardous waste derived fuels are burned in these furnaces, the February 21, 1991 BIF regulations do not apply to this facility. Please update your records accordingly. Feel free to call me at 216/429-6535 if you have any questions.

10

Tom J. Harlan, Jr. Sr. Environmental Management Engineer

Enclosures

cc: R. L. Nemeth

D. E. Papajcik

L. A. Szuhay

(All w/enclosures)

AL PROTEC

MAY 1 9 1989

### UNITED STATES **ENVIRONMENTAL PROTECTION AGENCY** REGION 5

RCRA ACTIVITIES P.O. BOX A3587 CHICAGO, ILLINOIS 60690 ENVIRONMENTAL CONTROL SEPT. CLEVELAND DISTRICT

RCRA ACTIVITIES

5-15-89

OHD004218623 RE: EPA ID #:

In response to your request of  $\frac{4-1-87}{1}$  following information has been updated on your your notification:

Waste activity repetated to include Off-Specification resed oil. Name Charged to LTV Steel. Waste Codes added. Installation Contact Charges.

Only your notification form has been revised. According to our records your company notified as a treater/storer/disposer (TSD) facility.

Pursuant to 40 CFR Part 270.72 (or equivalent State regulations), you must submit a revised Part A permit application prior to changes in ownership or operational control. If you have ceased your TSD activities, you must go through closure pursuant to 40 CFR Part 264/265 Subpart G (or equivalent State regulations). If you have never operated as a TSD facility, you must withdraw your Part A permit application. If you are located in the authorized States of Illinois, Indiana, Michigan, Minnesota, or Wisconsin, you must comply with the States' equivalent to the above referenced Federal rules. You must also submit the necessary documentation to the State contacts on the attached list.

Please contact the appropriate State agency on the enclosure for further information. If your facility is located in Ohio, contact Mr. George Hamper of the U.S. Environmental Protection Agency's Ohio Technical Section at (312) 353-4789.

Failure to act on this is a serious violation and may subject you to Federal or State enforcement actions under Section 3008 of the Resource Conservation and Recovery Act (or equivalent State authority). If you have any questions concerning this letter contact Ms. Sharon Kiddon at (312) 886-6173.

Sincerely,

Arthur S. Kawatachi, Chief

Information Section

RCRA Program Management Branch

Enclosure

cc: State Agency

Part A File



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 RCRA ACTIVITIES P.O. BOX A3587 CHICAGO, ILLINOIS 60690

### ILLINOIS

Illinois Environmental Protection Agency Division of Land Pollution Control 2200 Churchill Road, #24 Springfield, Illinois 62706 (217) 782-6761

### INDIANA

Indiana Department of Environmental Management Office of Solid & Hazardous Waste 105 South Meridian Indianapolis, Indiana 46225 (317) 232-4535

### MICHIGAN

Michigan Department of Natural Resources Hazardous Waste Division Waste Evaluation Unit Box 30028 Lansing, Michigan 48909 (517) 373-2730

### MINNESOTA

Minnesota Pollution Control Agency Solid & Hazardous Waste Division 520 Lafayette Road St. Paul, Minnesota 55155 (612) 297-1779

### WISCONSIN

Wisconsin Department of Natural Resources Bureau of Solid Waste Management P.O. Box 7921 Madison, Wisconsin 53707 (608) 266-0272

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IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)  A HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Pert 281.31 for each listed hexardous waste from non-specific sources your installation handles. Use solditional wheets if necessary.  FOOT 16 FOOT 17 FOOT 17 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT 18 FOOT	A HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 251.31 for each listed hazardous wests from non-specific sources your installation handles. Use additional sheets if necessary.    Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.   Fig.				<u> </u>		TICIAL CALLY
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R   0   6   2   K   0   6   3   K   0   8   7	C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Port 281.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.  C. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Port 281.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.  C. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Port 281.34 for each listed hazardous waste from hospitals, weterinsery hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.  E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Port 281.21 – 281.24.)  [Description of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port of the port	apocitio inicatatia accites your	miscanados nasioles. O	se socitional thesat it is	ecessary.	···	
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C. COMMERCIAL CHEMICAL PRODUCT HAZAROOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous wasts. Use additional sheets if necessary.  31	C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four—digit number from 40 CFR Part 281.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.    31	<del>                                   </del>			<del></del>	23 . 18	13 16
31 32 33 34 35 36 36 37 37 30 32 33 34 35 36 36 37 37 30 30 39 39 39 39 39 39 39 39 39 39 39 39 39	D. LISTED INFECTIOUS WASTES. Enter the four—digit number from 40 CFR Part 251.24 for each listed hazardous weste from hospitals, weterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.  E. CHARACTERISTICS OF NON—LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non—listed hazardous wastes your installation handles. (See 40 CFR Parts 251.24.)  [] 1. IGNITABLE [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [Deo2] [De	<del>┃                                    </del>	7	<del></del>	28	25	30
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D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.24 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.  E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 – 261.24.)  [] 1. IGNITABLE [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]  [Doos]	D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.  1. CEMBRACTERISTICS OF NON-LISTED HAZAROOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 – 261.24.)  1. IGNITABLE December 1	stance your installation handles	which may be a hazard	ious waste. Use addition	nal sheets if necessary,		The state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the s
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X. CERTIFICATION  I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.	X. CERTIFICATION  I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for abstraction this and all	nazaroous wastes your installatio	on mandles. (See 40 C)	·н Рэги 201.21 — 201.2	24.)		
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EPA Form 8700-12 (6-80) REVERSE



### ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

·080004218673

REPOBLIC STEEL CLEVELAND DISTRICT 3100 EAST 45TH STREET

CLEVELAND

08 44127

INSTALLATION ADDRESS

3100 EAST 45TH STREET CLEVELAND

OR 44127

EPA Form 8700-12A (4-80)



Official Business Penalty for Private Use \$300 FIRST-CLASS MAIL POSTAGE & FEES PAID EPA PERMIT NO. G-35

United States Environmental Protection Agency (WH-543) Washington, DC 20460

TO: REPUBLIC STEEL CLEVELAND DISTRICT
3100 EAST 45TH STREET
CLEVELAND OH 44127

ACKNOWLEDGEMENT

IOTIFICATION

OF HAZARDOUS

WASTE ACTIVITY

HOLD FIRMLY HERE

### ATTACHMENT D

For Company: Research Oil Co.

Physical Form = Liquid Unless Otherwise Specified

	Manifest						Material	Handling		Civ		Rec
Date	Number	Generator	Count	Type	Qty	Unit	Descr	Code	EPA Codes	(ppm)	(ppm)	
3/21/96	01097	Ferro Corp	1	TT	4500	1	wo	M061		ND	2220	
3/21/96	96334	Viking Tool	1	TT	750	G	ww/wo	M061		ND		103/129
3/21/96	96331	Starlite Diversified	1	TT	2125	G	ww/wo	M061		ND	ND	103/129
3/21/96	45716	Akzo Salt	· 1	TT	5000	G	ww	M094		ND	ND	11
3/21/96	45731	PPG Ind.	1	TT	4500	G	wo	M061		ND	ND	302
3/21/96	43820	LTV 126/127	1	П	5325	G	ww/wo	M061		ND	ND	129
3/21/96	45725	Ohio Jacobson	1	TT	5000	G	ww/wo	M094		ND		105
3/21/96	45734	Profile Grinding	1	TT	1000	G	ww/wo	M061		ND		103/129
3/21/96	45734	Torpedo Wire & Strip	1	TT	1000		ww/wo	M061		ND		103/129
3/21/96	96329	Johnson Controls	1 .	П	850		ww/wo	M061		ND		103/129
3/21/96	96291	Arro Forge	1	П	275		ww/wo	M061		ND	t	103/129
3/21/96	45646	Hussey Copper	1	11	5397	G	ww	M094		NT	NT	
3/21/96	49730	WPS Allenport	1	TT	5421		ww/wo	M061		ND	ND	
3/21/96		WPS Yorkville	1	TT	5000		ww/wo	M061	·	ND	ND	
3/21/96		Northwest Airlines	1	TT	1200		ww	M094		NT	NT	
3/21/96	43617	Hilltop Landfill	1	П	5500		ww	M094		NT	NT	11
3/21/96	43819	LTV 126/127	1	TT	4905		ww/wo	M061		ND	42	129
3/21/96		Preferred Rubber	ì	Π	800		ww/wo	M061		ND	,	129
3/21/96		7 & 7	i	П	5661		ww	M094		NT	NT	
3/21/96		Albrecht	L	П	750	l	ww/wo	M061		ND	570	
3/21/96		SC Mfg	1	TT	1075	[	ww/wo	M061	·	ND	570	
3/21/96	1	Small Oil Pick-ups	1	TT	1325	1	wo	M061		ND	570	
3/21/96		LTV Steel Gate 8	1	TT	3000		ww/wo	M061		ND	480	
3/21/96		Target Stamp	1	TT	2000		ww	M094		ND	ND	
3/21/96		Hussey Copper	1	П	6000		ww/wo	M094		ND	ND	
3/21/96	ř .	Rotek		TT	1450		wo	M061		ND	ND	
3/22/96		Akzo Sait		TT	5000		ww	M094		ND	ND	
3/22/96		Rexroth		TT	5000		ww/wo	M061		ND	ND	
3/22/96		LTV 126/127		П	5082		ww	M094		ND	ND	
3/22/96		Ridge Tool		TT	4500	l .	ww	M094		ND	460	
3/22/96		Worthington Precision Metals		Π	5000		ww	M094		ND	7640	
3/22/96		Perfection		TT	3000		ww	M094		ND	ND	
3/22/96	,	WP Allenport	1	TT	5000		ww/wo	M061		ND	ND	
3/22/96		MRC Bearing		TT	5000		ww/wo	M061		ND		98/129
3/22/96		LTV Aliquippa		П	5000		ww/wo	M061		ND	ND	
3/22/96		Parker Hannifin		TT	2800		ww/wo	M061		, ND	ND	105/129
3/22/96		Earl Corey Co.		TT	5500		wo	M061		ND	ND :	
3/22/96		Gradall		TT	3000		ww	M094		NT	NT	
3/22/96	03250	Eljer Pumbingware	1	Π	4800	G	ww	M094		NT	NT	11

For Company: Research Oil Co.

Physical Form = Liquid Unless Otherwise Specified

	Manifest				Material	Handling		Clv		Rec
Date	Number	Generator	Count Type		Descr	Code	EPA Codes	(ppm)	(ppm)	
3/22/96	45742	Jergins, Inc.	1 TT	1500 G	ww/wo	M061		ND	1260	
3/22/96		Small Oil Pickup	1 TT	950 G	wo	M061		ND	1260	
3/22/96	03251	Nordson Corp.	1 TT	2600 G	ww	M094		ND		103
3/22/96	45748	New Castle Rolling	1 TT	5000 G	ww/wo	M061		485		129
3/22/96	45740	BFI Glenwillow	1 11	5000 G	ww	M094		NT		103
3/22/96	45746	Bardons & Oliver	1 TT	1600 G	ww/wo	M061		ND		105
3/22/96	45749	BF Goodrich	1 11	5663 G	ww	M094		ND		105
3/22/96	45735	Wheatland Tube	1 TT	5500 G	ww	M094		ND	:	103
3/22/96	45723	PHB Parker	1 TT	5000 G	ww/wo	M061		ND	ND	1
3/22/96	45754	AJ Rose	1 TT	2800 G	ww/wo	M094		ND		105
3/22/96	-	BFI Cleveland	1 17	2487 G	ww	M094		ND		103
3/23/96	34681	Chrysler	1 TT	5341 G	ww/wo	M061		ND		301
3/23/96	96009	Midland Steel	1 177	3000 G	ww	M094		NT		103
3/23/96	45806	Akzo Salt	1 TT	5000 G	ww	M094		ND	ND	1
3/23/96	45902	Barmet Aluminum	1 11	4781 G	ww/wo	M061		ND		103/129
3/23/96	45817	Akzo Salt	1 TT	5000 G	ww	M094		NT	NT	11
3/23/96	45822	Eaton Corp.	1 TT	5000 G	ww/wo	M061		ND	295	103/129
3/23/96	43822	LTV 126/127	1 TT	4983 G	ww/wo	M061		ND		129
3/23/96	43823	LTV 126/127	1 TT	5676 G	ww/wo	M061		ND		129
3/23/96	45804	Akzo Salt	1 11	5000 G	ww	M094		ND	ND	1
3/23/96	96008	Midland Steel	1 TT	5500 G	ww	M094		NT		103
3/23/96	45808	PHB Parker	1 TT	5000 G	ww/wo	M061		ND		103/127
3/23/96		Universal Steel	1 TT	2000 G	ww/wo	M061		ND		129
3/23/96		Elliot Brother	1 17	5000 G	ww/wo	M061		ND		103/129
3/23/96		Flo-Tork	1 11	1500 G	ww/wo	M061		ND		103/129
3/23/96		Cardell Corp	1 17	700 G	ww/wo	M061		377	990	L
3/23/96	1	American Metal	1 TT	1100 G	ww/wo	M061		377	990	
3/23/96		SPS Tech	1 11	5000 G	ww/wo	M061		40		103/129
3/23/96		Akzo Salt	1 17	5000 G	ww	M094		ND	ND	L
3/23/96		Akzo Salt	1 177	5000 G	ww	M094		ND	ND	
3/23/96	1 .	Noco	1 177	4953 G	ww/wo	M061	·	ND		103/129
3/24/96	1	WP Yorkville	1 TT	3770 G	ww	M094		NT	NT	
3/24/96	1 .	Akzo Salt	1 TT	5000 G	ww	M094		ND	ND	
3/24/96	1	Rotek	1 17	4500 G	ww	M094		ND		98/129
3/24/96		Akzo Salt	1 TT	5300 G	ww	M094		NT	NT	
3/24/96	1	P & K Oil Services	. 1 17	5000 G	ww/wo	M061		ND	154	L
3/24/96	45835	WP Yorkville	1 TT	4160 G	ww/wo	M061		ND	ND	98/129
3/24/96	45820	New Castle Rolling Mills	1 11	5000 G	ww	M094		ND	ND	105
3/24/96	43824	LTV 126/127	1 TT	4315 G	ww/wo	M061		ND	312	129

For Company: Research Oil Co.

Physical Form = Liquid Unless Otherwise Specified

	Manifest			T			Material	Handling		Clv	Clt	Rec
Date	Number	Generator	Count	Туре	Qty	Unit	Descr	Code	EPA Codes	(ppm)	(ppm)	Tank
3/24/96	45825	Akzo Salt	1	TT	5000	G	ww	M094		NT	NT	11
3/25/96	960AP	Copperweld Shelby	1	TT	3397	G	ww	M094		ND	ND	98
3/25/96	45837	Design Metals	1	TT	5216	G	ww	M094		ND	ND	98
3/25/96	960AS	Copperweld Shelby	1	TT	4269	G	ww	M094		ND	ND	98
3/25/96	01248	Еххол	1	TT	5421	G	ww/wo	M061		ND	ND	129
3/25/96	45919	LTV Mobil Equipment	1	TT	100		ww/wo	M061		ND	ND	129
3/25/96	45918	LTV Steel	1	1T	977	G	ww/wo	M061		ND	ND	129
3/25/96	45840	Worthington Precision Metals	1	TT	5000	G	ww	M094		ND	ND	103
3/25/96	73912	7 & 7	1	TT	5261	G	ww	M094		ND	ND	98
3/25/96	45839	WP Allenport	1	П	5184	4	ww/wo	M061		ND		129
3/25/96	96335	Starlite Inc.	1	TT	1350	1 .	ww	M094		ND	ND	105
3/25/96	96336	Channellock	1	TT	4000	G	ww	M094		ND	ND	105
3/25/96	43826	LTV 126/127	1	TT	5682	G	ww/wo	M061		ND	ND	129
3/25/96	45836	LTV Steel	1	TT	3000	G	ww/wo	M061		ND	ND	98/129
3/25/96	45834	Werner Co.	1	11	4600	G	ww/wo	M061		ND	ND	105
3/25/96	45838	On-Spec Fuels	1	TT	5000	1	ww/wo	M061		ND	261	103/129
3/25/96		Copperweld Shelby	1	TT	5231	I	ww	M094		ND	ND	103
3/25/96	45809	PHB Parker	1	TT	5000	!	ww	M094		ND	ND	
3/25/96	45828	LTV Kirby Road	1	TT	4500	G	ww	M094		NT	NT	98
3/25/96	45830	Teledyne Fluid	1	TT	2300		ww	M094		NT	NT	103
3/25/96		Akzo Salt		TT	5000		ww	M094		NT	NT	11
3/25/96	43618	Hilltop Landfill		TT	5000		ww	M094		NT	NT	11
3/25/96		Stanley Air		П	1100		wo	M061		ND	ND	302
3/25/96		JW Harley	1	TT	400		wo	M061		ND	ND	302
3/26/96		Copperweld Shelby	1	TT	4134		ww	M094		NT	NT	
3/26/96		Copperweld Shelby		TT	3628	i	ww/wo	M061		ND	ND	
3/26/96		Ohio Jacobson		TT	4000		ww/wo	M061		ND	ND	105
3/26/96		Owen Brockway		TT	1400		ww/wo	M061		DN	ND	129
3/26/96		LTV 126/127		TT	5381		ww/wo	M061		ND	ND	129
3/26/96		LTV Jennings		TT	1968		ww/wo	M061		ND	ND	
3/26/96		Wheeling Pitt Steel		Π	5666	1	ww/wo	M061		ND	ND	
3/26/96		Wheeling Pitt Steel		П	5000		ww/wo	M061		ND		129
3/26/96		Exxon		Π	4547		wo	M061		ND	ND	302
3/26/96		Akzo Salt		TT	5000		ww	M094		NT	NT	11
3/26/96		On-Spec Fuels		П	5000		ww/wo	M061		ND	ND	302
3/26/96		Argo Tech		Π	2700		ww/wo	M094		ND	ND	105/129
3/26/96		Envirosafe		TT	5453	L	ww	M094		NT	NT	11
3/26/96		Dresser Rand Tube Products		П	4500		ww	M094		ND	ND :	98
3/26/96	45926	USS/Kobe Steel	1	Π	5247	G	wo	M061		ND	ND :	52

For Company: Research Oil Co.

Physical Form = Liquid Unless Otherwise Specified

	Manifest						Material	Handling		Clv	Cit	Rec
Date	Number	Generator	Count	Туре	Qty	Unit	Descr	Code	EPA Codes	(ppm)	(ppm)	ľ
3/26/96		LTV Steel	1	TT	5000	G	ww/wo	M061		ND		129
3/26/96		Ardcor	1	TT	1200	G	ww	M094		ND	,	103
3/26/96	45930	Presrite	1	TT	3500	3	ww/wo	M061		ND		
3/26/96		Akro Corp	1	TT	4000	G	ww	M094		ND	ND	
3/26/96	01249	Exxon	1	TT	5616	G	ww/wo	M061		ND	ND	
3/26/96	43825	LTV 126/127	1	TT	5195	G	ww/wo	M061		ND	ND	L
3/26/96		Eaton Corp	1	TT	4209		ww	M094		ND		105
3/27/96	45963	Teledyne Specialty	1	TT	1700	G	ww	M094		ND		
3/27/96		Exxon	1	TT	5536	Ģ	ww/wo	M061		ND		
3/27/96		Exxon	1	TT	5514		ww/wo	M061		ND	ND	
3/27/96		Worthington Precision Metals		T	5500		ww	M094		ND	ND	103
3/27/96		Penn Jacobson		П	1825	l	ww/wo	M061		ND	568	103/129
3/27/96		LTV 126/127	1	Π	5169		ww/wo	M061		ND	ND	
3/27/96		Interstate Diesel	1	П	1550	1	ww	M094		ND	ND	103
3/27/96		Matlack	1	П	5000		ww	M094		ND	ND	98
3/27/96		PPG Gurnee	1	П	5071		ww/wo	M061		ND	ND	302
3/27/96		Exxon	1	TT	5056	G	ww/wo	M061		ND	ND:	
3/27/96		B & C Ind	1	TT	5100	G	ww	M094		ND	ND	
3/27/96		Caparo Steel	1	11	3000	G	ww/wo	M061		ND		103/129
3/27/96		Northwest Airlines	1	TT	1200	G	ww	M094		NT	NT S	
3/27/96	45954	BFI of Ohio		<b>1</b> 7	1300	G	ww	M094		NT	NT S	
3/27/96		Wheeling Pitt Steel	1	TT	5196		ww/wo	M061		ND	ND :	
3/27/96		PHB Parker	1	TT	5000		ww	M094		NT	NT	
3/27/96		Snap Tite		TT	4900		ww	M094		ND	321	103
3/27/96		LTV Steel		T	5000		ww/wo	M061		ND	ND.	129
3/27/96		Lincoln Electric	1	TT	1815		ww	M094		ND	ND .	
3/27/96		American Ultra Specialties	1	TT	6500	G	ww/wo	M061		ND		103/129
3/27/96		Commercial Intertech	1	TT	3000	F	ww/wo	M061		ND		103/129
3/27/96		Smith & Harris Machine	1	TT	3418	G	ww	M094		ND	ND 9	
3/27/96		Copperweld Shelby	1	TT	5233	G	ww	M094		ND	ND 9	
3/27/96	,	Empire Die		TT	1000	G	ww/wo	M061		ND	ND 1	
3/27/96		Morse Ind	1	TT	5000	G	ww/wo	M061		ND	10442 1	
3/27/96		Franklin Oil	1	Π	5000	G	ww/wo	M061		ND	3857 1	
3/27/96		Air Power Ohio	1	TT	1200	G	ww/wo	M061		ND		103/129
3/27/96		Exxon	1	TT	5595	G	ww/wo	M061		ND	ND 1	
3/27/96	1	Exxon .	1	Π	5611	G	ww/wo	M061 .		ND	ND 1	,
3/27/96		Akzo Salt	1	П	5500	G	ww	M094		NT	NT 1	
3/27/96		Ridge Tool	1	TT	5000	G	ww	M094		ND	ND 1	
3/27/96	43829	LTV 126/127	1	TT	5549	G	ww/wo	M061		ND	ND 1	

Legend: ww=wastewater/liquid, wo=waste oil/liquid, ws=waste sludge/solid, M061=fuel blending, M094=wastewater pretreatment ND=less than 50 ppm, NT=not tested (no free oil layer)

JUN 03 1997

U.S. Environmental Protection Agency Enforcement and Compliance Assurance Branch (DRE-8J) 77 West Jackson Blvd. Chicago, Illinois 60604

DIVISION FRONT OFFICE Attention: Mr. Robert Dean Smith Waste, Pesticides & Toxics Division U.S. EPA - REGION 5

Dear Mr. Smith:

Subject: LTV STEEL COMPANY, INC. - CLEVELAND WORKS

INFORMATION REQUEST - APRIL 17, 1997

SECTION 3007 RCRA AND SECTION 104(e) CERCLA U.S. EPA ID NO. OHD 004218673 AND OHD 046203774

This letter is in response to the information request of April 17, 1997, requesting certain information regarding LTV Steel's burning 1, 1997, between Per conversation on May used oil. Dale Papajcik of LTV Steel and John H. Tielsch of U.S. EPA, the information requested is focused on the burning of used oil issues only. Additionally, Mr. Tielsch agreed to extend submittal of this information to the week of May 26, 1997.

U.S. EPA Request #1 -

Persons consulted in the preparation of the information were:

- 1. Dorothy M. Ellington, Research Oil Company
- John W. Etchison, Manager Solid Waste, LTV
- 3. Robert A. Voytko, Engineer, Env. Control, LTV
- 4. Stanley Rihtar, Compliance Engineer, LTV
- 5. Peter Wosotowsky, Area Manager, Iron Producing, LTV
- 6. David Rupar, Area Manager, Utilities & Energy, LTV

U.S. EPA Request #2 -

Documents utilized in preparation of the information are included in Attachment A and Attachment D.

U.S. EPA Request #3 -

Additional persons who may provide more detailed response are referred to in Attachment A.

- 1. Alan Gressel, Research Oil Company
- 2. Bob Lehman, Research Oil Company

U.S. EPA Request #4 -

The EPA ID numbers for LTV Steel Cleveland Works are: OHD 004218673

OHD 046203774

U.S. EPA Request #5 -

Persons involved with handling the used oil are as follows:

- 1. Transportation and Unloading Research Oil Company Driver (1)
- Tracking of Shipments LTV Steel Iron Producing Clerk (1)
- Maintenance of Equipment
  - a. LTV Utilities & Energy Process Automation Engineer (1)
  - LTV Utilities & Energy Test Engineers

Mr. Smith May 29, 1997 Page 2

- c. LTV Utilities & Energy Repair Technicians
- d. LTV Utilities & Energy Electronic and Instrument Repairman
- e. LTV Iron Producing Maintenance Supervisors (4)
- f. LTV Iron Producing Area Supervisors (2)
- q. LTV Iron Producing General Supervisor Maintenance (1)
- h. LTV Iron Producing Blower Foreman (8)
- i. LTV Iron Producing Turn Foreman (4)
- j. LTV Iron Producing Shift Manager (4)

### U.S. EPA Request #6 -

Copies of all pertinent RCRA permit documents are included in Attachment B.

### U.S. EPA Request #7 -

Copies of permit applications are included in Attachment B. Notifications of hazardous waste activities are included in Attachment C.

### U.S. EPA Request #8 -

To rebut the presumption that used oil burned in LTV Steel's C5 and C6 blast furnaces with a total halogen concentration in excess of 1,000 ppm is a hazardous waste derived fuel, LTV Steel relies on a procedure adopted and followed by Research Oil Company (ROC), the only used oil fuel supplier to LTV Steel. The written ROC procedure is included as Attachment A. Data collected by ROC pursuant to the procedure and which relates to the data sheets provided by LTV Steel to the U.S. EPA and referred to in the information request, is included as Attachment D. Such data indicates that the oil material received by ROC, which is used in the production of the fuel shipped to LTV Steel, was not a hazardous waste containing material. Therefore, since ROC utilized no used oil containing a hazardous waste, their system, which produces the used oil shipped to LTV Steel, cannot and did not produce a hazardous waste derived fuel. Consequently, it is clear that the data generated by application of the ROC incoming oil analytic procedure successfully rebuts the presumption that the oil LTV Steel burns in C5 and C6 blast furnaces is a hazardous waste.

### U.S. EPA Request #9 -

LTV Steel blast furnaces (Iron Producing Department) receives used oil processed for fuel from Research Oil Company (ROC) for use as a supplement to No. 6 oil for injection as fuel to blast furnaces C5 and C6, only. These blast furnaces are located at the facility with U.S. EPA ID No. 004218673. The oil is pumped directly from the ROC delivery tanker to the oil day tank, where it becomes mixed with the No. 6 fuel oil. The oil is pumped through a distribution system which heats and recirculates oil not injected back to the day tank. Flow controls at each blast furnace meter the oil for injection by injection pipes directly into the blast furnace tuyeres. Approximately four ROC tanker truck loads of used oil are received each weekday by LTV Steel.

Mr. Smith May 29, 1997 Page 3

Please contact me if you have any questions regarding any of the foregoing information.

Very truly yours,

LTV STEEL COMPANY, INC.

R. L. Nemeth

Manager

Environmental Control

Attachments

CERTIFIED - RETURN RECEIPT



May 23, 1997

LTV STEEL COMPANY 3100 E. 45th Street Cleveland, Ohio 44127-0000

Attention:

Mr. Stan Rihtar

**Environmental Control Department** 

Dear Stan:

Enclosed with this letter are four items that detail the program and procedures used at Research Oil Company to manage the production of fuel oil from used oil in conformance with the requirements to rebut the presumption of mixing hazardous waste with used oil that arrives at our facility with a halogen content of 1,000 ppm or more. They are:

- 1. Explanation of Research Oil's used oil management procedures;
- 2. Memorandum on the microcoulometer from Bob Lohman to me;
- Research Oil Company Laboratory procedures for the microcoulometer; and,
- A copy of microcoulometer procedures from the Dohrmann Operating Manual.

I believe these will satisfy your requirements. If you need further information, please call me on Wednesday, May 28 or if you need help on Tuesday, May 27, call Alan Gressel.

Sincerely,

Dorothy M/Ellington,

Environmental Compliance Manager

cc:

Alan Gressel - ROC

Bob Lohman - ROC

### OFF-SPEC FUEL OIL AND THE REBUTTABLE PRESUMPTION

Research Oil Company ships both on-spec and off-spec fuel oil to LTV. On-spec fuel oil exits the regulatory system before it is received at LTV. On-spec fuel oil can contain as much as 4,000 ppm of total halogens so long as the processor/marketer can successfully rebut the presumption that the fuel oil product is a hazardous waste because it contains in excess of 1,000 ppm total halogens. At Research Oil, the rebuttal of the presumption that oils containing in excess of 1,000 ppm of total halogens are hazardous results from a testing and management system that begins before the used oil is even shipped to the Research Oil plant.

At Research Oil, off-spec fuel is managed under the same system as on-spec fuel. The use of off-spec fuel in an industrial boiler or furnace impose certain recordkeeping requirements by the burner. These recordkeeping requirements for burning off-spec fuel containing more than 1,000 ppm total halogens are of considerable importance to LTV in order to insure that the plant operates in strict compliance with the requirements of Section 279 covering the management and burning of off-spec fuel oil. Below, we have outlined the management system employed by Research Oil to assure its customers, including LTV, that no hazardous waste fuel is ever shipped to their facilities.

The first step in our management of used oil is the requirement that all generators demonstrate that the oily liquid they intend to ship to us meets the definition of used oil. This information is communicated through completion of a generator profile and the submission of an adequate sample for analysis. Among the information required by the generator profile is the usage and management of the oil at its facility. information helps us determine the pathways through which halogens may enter the used oil. The profile helps us answer such questions as, does the facility use chlorinated solvents? Are chlorinated waxes added to the virgin oil to improve its extreme pressure characteristics? Is the oil used in an emulsion? Are lubricating oils mixed with metalworking fluids before shipment? Does the generator collect used oil at the point of use or is the used oil recovered from a centralized wastewater treatment system?

The answers to these questions help us to understand the origin of halogens that may be found in the oil during analyses. We consider salt water and brine, chlorinated solvents introduced during or after use, and the various chlorinated wax additives used in metalworking lubricants. Our laboratory analyzes the samples submitted based on our understanding of the use of the oily waste stream at the point of generation.

During this analysis, we perform three or four specific tests to better understand the amount, type, and derivation of halogens detected in the used oil. We make use of the microcoulometer to determine total organic halogens, the gas chromatograph to identify individual solvent types and volumes, the GC to determine the presence of PCB's, and the FALEX EP tester to confirm the presence of chlorinated waxes introduced for the purpose of improved metalworking.

Based on the customer profile, conversations with the generator, and the analytic results from our laboratory, Research Oil, mindful of the rebuttable presumption, classifies the generator's waste stream into three categories: 1) oil that meets the requirements for processing into fuel oil upon arrival (under 1,000 ppm TOX); 2) oils that need to be checked to insure that the hazardous presumption can be rebutted from analytic results (over 1,000 ppm TOX); 3) oils that fail and must be used in our hazardous waste derived fuel program or rejected. Results of this work is used to determine the tests to be applied to the first shipment and to further shipments of waste from the generator, as well as the price to be paid or charged for the acceptance of the waste. If the generator is satisfied with our price which is based on our categorization of his waste stream, we will accept the material at our plant. Each incoming load is subjected to at least two analyses related to the volume and type of halogenated material in the waste stream. The minimum profile requirements on any inbound waste stream with organic content are a microcoulometer test to determine total halogens and a GC to determine PCB content. If the microcoulometer shows less than 1,000 ppm of total halogens and the PCB test less than 2 ppm, the oil may, subject to further analysis, be managed as on-spec oil.

If the microcoulometer indicated more than 1,000 ppm of total halogens, the volatile halogen content that is measured in the same microcoulometer test, is considered. If the original sample and prior shipment profiles differ from the analysis of this particular shipment, the GC is employed to determine the presence of solvents whose nature and volume would disqualify the material from being used in the production of on-spec or off-spec fuel oil. The GC analysis is used to determine if the particular shipment can be included in the raw material for the production of off-spec used oil or if the generator should be notified that the particular shipment is a hazardous waste by Research Oil analysis so that they can determine if they will pay us to manage the waste stream as a hazardous waste or if they want us to return the shipment.

If the microcoulometer test is consistent with the generator profile and the fingerprint of the first shipment, the shipment is pumped to the feed tanks for the fuel oil production system.

The standard parameter used at Research Oil to rebut the presumption that an oil with more than 1,000 ppm of halogens is hazardous is the presence of less than 100 ppm of any one solvent that appear on EPA's list of F001 and F003 halogenated solvents. Oils that exceed this levels are classified as hazardous waste.

I am confident that Research Oil's procedures meet every requirement that can be inferred from both Section 266, now in force in Ohio, and Section 279, soon to be adopted in Ohio, and will continue to protect our customers, our generators, and ourselves from any violation of EPA regulations.

### MEMORANDUM

TO:

Dorothy Ellington, Compliance Manager

FROM:

Robert Lohman, Chief Chemist

DATE:

May 22, 1997

SUBJECT: Rebuttable Presumption Testing

You inquired about the evolution of the analytic procedures we use at Research Oil to rebut the presumption that used oils received at the facility with more than 1,000 ppm of total halogens are hazardous waste. When the rebuttable presumption was first instituted, we used the microcoulometer to gain rapid, accurate, and efficient knowledge of the total organic chlorides in incoming samples. From the beginning, we tested each incoming load.

We were visited by Ms. Shirlee Brauer of Region 5 USEPA who was checking compliance with the new regulation. She asked how often we sampled incoming used oil for halogens. When we told her that we checked every load, she was shocked because she never contemplated our using anything but the Parr bomb to do these tests. When we showed her a microcoulometer procedure in SW 846, USEPA's lab manual, she was satisfied.

As we used the microcoulometer, I developed a procedure to determine volatile (solvent) chlorine with the microcoulometer by first positioning the sample only part way into the furnace to burn off and record only the chlorine in volatile solvents. Since then we have reported halogens as VC for volatile chlorides and TC for total organic halogens.

A few years later, OEPA questioned our use of the microcoulometer to rebut the presumption. I then ran 50 samples on both the microcoulometer and on the GC. The correlation between a low volatile chlorine number (300 ppm or less) on the microcoulometer was compared to GC scans for solvents listed in F001 and F003 by USEPA. These 50 samples showed perfect correlation between microcoulometer readings under 300 ppm and GC scans of less than 100 ppm for any F001-F003 solvent.

We own and operate two Dohrmann microcoulometers. When I was visited by a Dohrmann technical representative, I demonstrated my method of determining both volatile chlorine and total organic halogens on the same sample in one procedures. Dohrmann was so impressed with this solution that they now sell all their machines with a mark to indicate the position of the sample boat to determine volatile chlorine and have included the procedure in their operating manual supplied to purchasers of microcoulometers.

Because of our experience and these endorsements of our procedure, we only use the GC in the rebuttable presumption procedures when it is important to determine which of the solvents listed under F001 and F003 is present in the used oil. This question usually arises when the specific solvent would be important to determining its source.

If I can be of further assistance, please let me know.

RL:cm

### RUNNING SAMPLES

- 1. For samples, switch time to 10 minutes.
- 2. Position the boat under the injection port using the TX MODE.
- 3. Prepare samples the same as for the other machine using isooctane to extract the organic chlorine. (Samples can be diluted in water or injected directly but in these cases the results would be TX (total halides, organic and inorganic). We are interested in TOX (total organic halides) because these are potentially hazardous.
- 4. Inject 4 ul of sample, depress start, the boat will automatically move to the volatile position and remain there for 1 minute 30 seconds. If this is not long enough for the volatile to come off, switch the mode to EOX and the boat remains at this position. By switching back to TX the boat moves into the furnace for non-volatile chlorine. With the time setting at 10 minutes the counting will automatically stop. If this is still not enough time the sample will need a higher dilution factor. Watch baseline come back to original baseline (or close) to tell if all volatile has come off. Samples can also be run on ug (1000 ng/ug).

### CALCULATIONS

$$VOX(ppm) = \frac{[integrated\ VOX\ reading(ng)\ -blank(ng)\ ]\ (dilution\ factor)}{[volume(ul)\ ]\Big[density\Big(\frac{mg}{ul}\Big)\Big] (recovery\ factor)}$$

$$% VOX = \frac{ppm}{10,000}$$

$$TOX(ppm) = \frac{[integrated\ TOX\ reading(ng)\ -blank(ng)\ ]\ (dilution\ factor)}{[volume(ul)\ ]\Big[density\Big(\frac{mg}{ul}\Big)\Big](recovery\ factor)}$$

% 
$$TOX = \frac{ppm}{10,000}$$

VOX = Volatile Organic Halogen

TOX = Total Organic Halogen

volume = volume injected

density = original sample weight (same as g/ml)

recovery factor = std reading (ng)/standard (ng)

1000 ng = 1 ug

### DOHRMANN'

) SCOTT BLVD., P.O. BOX 58007 SANTA CLARA, CA 95052-8007

(513) 247-7000 Acc# 170689

# MC-3 ANALYZER MODULE SYSTEMS MANUAL

### PROPRIETARY INFORMATION NOTICE

THIS DOCUMENT CONTAINS PROPRIETARY IMEORMATION WHICH SHOULD NOT BE REPRODUCED OR TRANSFERRED TO OTHER DOCUMENTS OR DISCLOSED TO OTHERS OR USED FOR MANUFACTURING OR ANY PURPOSE OTHER THAN OPERATION, MAINTENANCE, OR SALE OF DORMANN EQUIPMENT WITHOUT PRIOR WRITTEN PERMISSION OF DORMANN DIVISION.

ALL OR PART OF THE INFORMATION ON THIS DOCUMENT MAY BE COVERED BY U.S. AND FOREIGN PATENTS.

Part No. 915-231

Edition 3: November 1988

### APPENDIX D

### DETERMINATION OF TRACE CHLORINE IN WASTE OIL AND SOLVENTS

### I. INTRODUCTION

Recent EPA regulations determine the permitted use of recycled waste oil and solvents depending on the level of total halogen (TX) in the material. For example, any used oil to be sold for burning in non-industrial boilers must be tested for TX. A simple and accurate test for TX in oil is of great value to all producers, transporters, brokers, and users in the waste oil industry.

DOHRMANN's DX-20B is specifically designed for measurement of TX in waste oil and similar substances. It is sensitive well below the 1 ppm to avoid false positives and negatives at critical action levels.

### II. SCOPE

The following methods are used for the determination of total halide (TX) concentration in organic samples in the range of 25 to 25,000 ngs. They are applicable to solids and other samples which cannot be drawn with an ordinary syringe.

### SUMMARY OF METHOD

Without pretreatment, the analyst injects a sample onto a boat residing in an inert CO₂ (N₂, He or Ar) environment. After pressing "START," following baseline memorization, the boat is advanced to the 250° zone where entrained water and other volatiles are vaporized and, eliminated or measured, as desired. The boat is advanced again into the 1000° combustion zone where, in a 75% CO₂ and 25% O₂ environment, the sample is oxidized. The gaseous products of oxidation (including CO₂, H₂O, HX) are swept

into the detection cell where any halide or oxyhalide formed is coulometrically titrated with silver ion. That is, the total current required to replace the consumed silver ion and maintain a constant silver ion concentration in the cell is a direct measure of the chlorine present in the injected sample.

### V. APPARATUS

- A. One of the following DOHRMANN systems:
  - DX-20B Total Halide Analyzer (p/n 832-282). This system includes all necessary instrumental hardware and glassware.
  - 2. DX-20A Total Organic Halide Analyzer (p/n 832-280) retrofitted with an EOX/TX solenoid valve assembly (p/n 899-479).



### **UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

APR 2 1997

DRE-8J

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. John H. Stewart, Jr. Registered Agent for LTV Steel Company. 600 West Church Street East Canton, Ohio 44730

Re: Information Request

EPA ID. No.: OHD 004 218 673 E

OHD 046 203 774

Dear Mr. Stewart:

This is a request for information by the United States Environmental Protection Agency (U.S. EPA) pursuant to its authority under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. §6927 and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S.C. §9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. Law No. 99-499, 100 Stat. 1613 (1986) (SARA). The information requested relates to the handling of solid waste, hazardous waste, and hazardous substances at LTV Steel Company, Cleveland, Ohio, and all contiguous property owned by or under the control of LTV Steel Company., hereinafter referred to as the Facility. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

The information requested herein must be provided to this office within fifteen (15) days of receipt of this letter notwithstanding its possible characterization as confidential information. Due to the seriousness of the threat posed by the Facility and the legal ramifications of your failure to respond promptly and properly, U.S. EPA strongly encourages you to give

this matter your immediate attention and to respond fully to these Information Requests within the time specified above.

You may, pursuant to 40 CFR 2.203(a), assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR 2.203(b). Information covered by such a claim will be disclosed by U.S. EPA only to the extent and by means of the procedures set forth in 40 CFR Part 2, Subpart B. Any request for confidentiality must be made when the information is submitted, since any information not so identified may be made available to the public without further notice.

The written statements submitted pursuant to this request must be notarized and submitted under an authorized signature certifying that all statements contained therein are true and accurate to the best of the signatory's knowledge and belief. Any documents submitted to U.S. EPA Region V pursuant to this information request should be certified as true and authentic to the best of the signatory's knowledge or belief.

Should the signatory find, at any time after the submittal of the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should so notify Region V. If any answer certified as true should be found to be untrue or misleading, the signatory can and may be prosecuted pursuant to 18 U.S.C. §1001. U.S. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action.

If you have any questions regarding this matter, please contact Mr. Robert Dean Smith, Enforcement and Compliance Assurance Branch, at (312) 886-7568, or Mr. John Tielsch, Assistant Regional Counsel, at (312) 353-7447. Your response should be sent to the U.S. EPA, Region V, Enforcement and Compliance Assurance Branch (DRE-8J), 77 West Jackson Blvd., Chicago, Illinois 60604, Attention: Robert Dean Smith.

Sincerely yours,

George Hamper, Chief MN/OH Section Enforcement and Compliance Assurance Branch

### Enclosure

cc: John Tielsch, ORC

Timothy Chapman, ORC Robert Smith, ECAB

Section File
Branch File

### ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY
AUTHOR/ TYPIST	MINN/OHIO SECTION CHIEF	MICHIGAN/ WISCONSIN SECTION CHIEF	ILLINOIS/ INDIANA SECTION CHIEF	ECAB BRANCH CHIEF	WPTD DIVISION DIRECTOR
PCD4 4/2/97	14-297			a v	-

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

LTV STEEL COMPANY WEST	)	Information Request
3341 JENNINGS ROAD	)	Pursuant to
CLEVELAND, OHIO 44127	)	Section 3007 of RCRA
	)	as amended, 42 U.S.C. §6927
U.S. EPA ID No.: OHD 046 203 774	)	and Section 104(e) of
	)	CERCLA 42 U.S.C. §9604(e)
LTV STEEL COMPANY EAST	)	
3341 JENNINGS ROAD		
CLEVELAND, OHIO 44127		
U.S. EPA ID No.: OHD 004 218 673		

This is a request by the United States Environmental Protection Agency (U.S. EPA) issued pursuant to its authority under Section 3007 of the Resource Conservation and Recovery Act, as amended, 42 U.S.C. §6927 and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S.C. §9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. Law No. 99-499, 100 Stat. 1613 (1986) (SARA). The issuance of this request serves to require LTV Steel Company., (Respondent) to submit information relating to the generation, treatment, transportation, storage, disposal, and releases of solid wastes, hazardous wastes. hazardous constituents, hazardous substances, pollutants, and contaminants at 3341 Jennings Road, Cleveland, Ohio and 25 Prospect Street, Cleveland, Ohio, is for the purpose of enforcing the provisions of RCRA and CERCLA. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq. U.S. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action.

#### INSTRUCTIONS

- 1. A separate response must be made to each of the questions or requests set forth in this Information Request.
- 2. Precede each answer with the number of the Information Request to which it corresponds.

- 3. In answering each Information Request, identify all contributing sources of information.
- 4. If information not known or not available to the Respondent as of the date of submission of its response should later become known or available, Respondent must supplement its response to U.S. EPA. Moreover, should the Respondent find, at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth, respondent must notify U.S. EPA as soon as possible.
- 5. For each document produced in response to this request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.
- 6. You must respond to the Information Request on the basis of all information and documents in your possession, custody or control or in the possession, custody or control of your former or current employees, agents, servants, contractors or attorneys. Furnish such information as is available to you, regardless of whether or not it is based on personal knowledge, and regardless of source.
- 7. Your response should be accompanied by a notarized affidavit from a responsible company official or representative stating that a diligent record search has been completed and that there has been a diligent interviewing process with all present and former employees who may have knowledge of the Respondent's operations, storage, treatment, releases, spills, disposal or handling of solid wastes, hazardous wastes, hazardous constituents, hazardous substances, pollutants, or contaminants. To the extent that any information you provide relating to these Requests is based on your personal knowledge, or the personal knowledge of your employees, agents, or their representatives, this information shall be in the form of a notarized affidavit.
- 8. If any documents requested herein have been transferred voluntarily or involuntarily to others or have been otherwise disposed of, identify each such document, identify the person to whom it was transferred, describe the circumstances surrounding such transfer or other disposition, and state the date or approximate date of such transfer or other disposition.

- The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. Information covered by such a claim will be disclosed by U.S. EPA only to the extent, and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. [See 41 Federal Register 36902 et seq. (September 1, 1976); 43 Federal Register 4000 et seg. (December 18, 1985)]. If no such claim accompanies the information when it is received by U.S. EPA it may be made available to the public by U.S. EPA without further notice to you. You should read carefully the above-cited regulations, together with the standards set forth in Section 104(e)(7) of CERCLA, before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim, as stated in Section 104(e)(7)(ii) of CERCLA.
- 10. The information requested herein must be provided, within fifteen (15) days following receipt of this request, to the United States Environmental Protection Agency, Region V, Enforcement and Compliance Assurance Branch (DRE-8J), 77 West Jackson Blvd., Chicago, Illinois 60604, Attention: Robert Dean Smith.

### **DEFINITIONS**

For the purpose of the Instructions and Requests for Information set forth herein, the following definitions shall apply:

- 1. The term "you" or "Respondent" shall mean the addressee of the Request, the addressee's officers, managers, employees, contractors, trustees, predecessors, successors, assigns, subsidiaries, and agents.
- 2. The term "person" as used herein includes, in the plural as well as the singular, any natural person, firm, contractor, unincorporated association, partnership, corporation, trust or governmental entity, unless the context indicates otherwise.
- 3. "Facility" means all contiguous land and structures, other appurtenances and improvements on the land used for treating,

storing or disposing of hazardous waste. A facility may consist of several treatment, storage, or disposal operational units (e.g., one or more landfills, surface impoundments or combinations of them) (40 CFR 260.10).

- 4. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, including mixtures of hazardous substances with other substances including petroleum products.
- 5. The term "pollutant" or "contaminant" shall have the same definition as that contained in Section 101(33) of CERCLA.
- 6. The terms "furnish", "describe", "provide" or "indicate" shall mean turning over to U.S. EPA either original or duplicate copies of the requested information in the possession, custody, or control of the Respondent. Where specific information has not been memorialized in any document but is nonetheless responsive to an information request, you must respond to the request with a written response. If such requested information is not in your possession, custody, or control then indicate where such information or documents may be obtained.
- 7. The term "identify" means, with respect to a natural person, to set forth his full name, present or last known business address, the name of that employer and a description of the job responsibilities of such person.
- 8. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship) to set forth its full name, address, legal form (e.g. corporation, partnership, etc.) organization, if any, and a brief description of its business.
- 9. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance of the subject matter.
- 10. "Release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, abandonment or discarding of barrels, containers, and other

closed receptacles containing any hazardous substances or pollutants or contaminants.

- As used here, "document" and "documents" shall include writings of any kind, formal or informal, whether or not wholly or partially in handwriting (including by the way of illustration and not by way of limitation), any invoice, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements, and the like, diary, calendar, desk pad, scrap book, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc, or disc pack; and any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc or disc pack, tape or other type of memory and together with printouts of such punch card, disc or disc pack, video tape or other type of memory); including (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like of it, drafts, (d) attachments to or enclosures with any documents and (e) every document referred to in any other document.
- 12. "And" as well as "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these Information Requests any information which might otherwise be construed to be outside their scope.
- 13. "Hazardous waste" means a hazardous waste as defined in 40 CFR 261.3.
- 14. "Solid waste" means a solid waste as defined in 40 CFR 261.2.
- 15. "Hazardous Constituent" means a hazardous constituent identified in 40 CFR 261, Appendix VIII.

- 16. "Manifest" means the shipping document originated and signed by the generator which contains the information required by 40 CFR 262.20.
- 17. "Industrial Furnace" means any of the following enclosed devices that are integral components of manufacturing processes and that use thermal treatment to accomplish recovery of materials or energy:
  - (1) Cement Kilns
  - (2) Lime kilns
  - (3) Aggregate kilns
  - (4) Phosphate kilns
  - (5) Coke ovens
  - (6) Blast furnaces
  - (7) Smelting, melting and refining furnaces (including pyrometallurgical devices such as cupolas, reverberator furnaces, sintering machines, roasters, and foundry furnaces)
  - (8) Titanium dioxide chloride process oxidation reactors
  - (9) Methane reforming furnaces
  - (10) Pulping liquor recovery furnaces
  - (11) Combination devises used in the recovery of sulfur values from spent sulfuric acid
  - (12) Halogenated acid furnaces (HAFs) for the production of acid from halogenated hazardous waste generated by chemical production facilities where the furnace is located on the site of a chemical production facility, the acid product has a halogen acid content of at least 3%, the acid product is used in a manufacturing process, and, except for hazardous waste burned as fuel, hazardous waste fed to the furnace has a minimum halogen content of 20% as-generated.
  - (13) Such other devises as the Administrator may, after notice and comment, add to this list. (40 CFR 260.10)
- 18. "Used oil" means any oil that has been refined from crude oil, or any synthetic oil, that has been used and as a result of such use is contaminated by physical or chemical impurities. (40 CFR 260.10)

- 19. "Used oil fuel" means used oil that is burned for energy recovery in a boiler or industrial furnace that is not regulated under Subpart O of part 254 or 265 of 40 CFR, except as provided by 40 CFR 266.40 (c) and (e). Used oil includes any fuel produced from used oil by processing, blending, or other treatment. (40 CFR 266.40(a).
- 20. "Burn" means burning for energy recovery or destruction, or processing for materials recovery or as an ingredient. (40 CFR 266.100(a))

### REQUESTS

- 1. Identify all persons consulted in the preparation of the answers to these Information Requests.
- 2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests and provide copies of all such documents.
- 3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.
- 4. List the EPA Identification Numbers of the Respondent.
- 5. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of solid wastes, hazardous wastes, hazardous substances by you, your contractors, or by prior owners and/or operators.
- 6. Provide copies of all local, State and Federal environmental permits ever granted for the Facility or any part thereof (e.g., RCRA permits, NPDES permits, etc.). If any permits were applied for but not granted, provide copies of the applications for these permits.
- 7. Provide copies of all notifications of hazardous waste activities and all Part A Permit applications submitted pursuant to RCRA.

- 8. Furnish any and all documents and information which you claim tend to rebut the presumption contained in 40 CFR 279.63 and Ohio Administrative Code Rule 3745-58-50(c) that the used oil burned in your blast furnaces with a total halogen content greater than 1,000 parts per million (ppm), as indicated in the documents previously provided by you and attached hereto as "Attachment", is a hazardous waste.
- 9. Furnish all information concerning your handling, treatment, storage and/or disposal of the used oil burned in your blast furnaces.
- 10. Provide the following notarized certification by a responsible corporate officer:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiry of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Issued	this	day of					
1997.							
~							

George Hamper, Chief MN/OH Section Enforcement and Compliance Assurance Branch

2777 Broadway Avenue, Cleveland, OH 44115 Tel: 216 623-8383 FAX: 216 623-8393

APR 1 5 1996

Date: 03 / 27 /1996

Shipper # < 4503

OFFICE OF RCRA EPA REGION V

Moisture & Chlorine Analysis

Moisture: - 43 (ASTM D95-83)

Chlorine (ASTM SW846-9020 [modified]):

Volatile Chlorine

Total Chlorine « 0/0Z/

Analysis Certified by .

Transport Road Laboratory

Time Faxed: /// am/ pm

2777 Broadway Avenue, Cleveland, OH 44115 Tel: 216 623-8383 FAX: 216 623-8393

Date: 63 /27/1996

Shipper # C4504

Moisture & Chlorine Analysis

Moisture: <u>457</u> (ASTM D95-83)

Chlorine (ASTM SW846-9020 [modified]):

Volatile Chlorine : عرب المراكب

Total Chlorine : 576

Analysis Certified by

Transport Road Laboratory

Time Faxed: _____ am, / pm

2777 Broadway Avenue, Claveland, OH 44115 Tel: 216 623-8383 FAX: 216 623-8393

Date: 3 / 24 /1996

Shipper # <u>C45(3</u>

Moisture & Chlorine Analysis

Moisture: 0.5 (ASTM D95-83)

Chlorine (ASTM SW846-9020 [modified]):

Volatile Chlorine : UP

Total Chlorine : 09

Analysis Certified by . U.S. Page

Transport Road Laboratory

Time Faxed: 815 am pm

Quality Information on a Timely Basis

2777 Broadway Avenue, Cleveland, OH 44115 Tel: 216 623-8383 FAX: 216 623-8393

Date: 8 /2 (_/1996

Shipper # CASUL

Moisture & Chlorine Analysis

Moisture: 0.43 (ASTM D95-83)

Chlorine (ASTM SW846-9020 [modified]):

Volatile Chlorine : UD

Total Chlorine : Oh

Analysis Certified by . W. B. Page

Transport Road Laboratory

Time Faxed: 6 20 am/pm

Research Oil Conspany 2777 Broadway Avenus, Cleveland, OH 44715 Tel: 216 623-8383 FAX: 216 623-8393

Date: 03 / 23 /1996

Shipper # <u>-c.4516</u>

Moisture & Chlorine Analysis

Chlorine (ASTM SW846-9020 [modified]):

Volatile Chlorine:

Total Chlorine

Analysis Certified by .

Transport Road Laboratory

Time Faxed: _____ am / pm

Quality Information on a Timely Basis

2777 Broadway Avenue, Cleveland, OH 44115 Tel: 216 623-8383 FAX: 216 623-8393

Date: 03/27/1996

Moisture & Chlorine Analysis

Moisture: _____ (ASTM D95-83)

Chlorine (ASTM SW846-9020 [modified]):

Volatile Chlorine : VO

Total Chlorine : -6787

Analysis Certified by

Transport Road Laboratory

Time Faxed: 10 00 am / pm

2777 Broadway Avenue, Cleveland, OH 44115 Tel: 216 623-8383 FAX: 216 623-8393

Date: 63 / 25 / 1996

Shipper # <u>C 4509</u>

Moisture & Chlorine Analysis

Moisture: _____ & (ASTM D95-83)

Chlorine (ASTM SW846-9020 [modified]):

Volatile Chlorine: _ ~

Total Chlorine : 1972

Analysis Certified by .

Transport Road Laboratory

Time Faxed: <u>109.30</u> (am)/ pm

2777 Broadway Avenue, Cleveland, OH 44115 Tel: 216 623-8383 FAX: 216 623-8393

Date: 03 /27 /1996

Shipper # < 4/5° 5

Moisture & Chlorine Analysis

Moisture: (60 (ASTM D95-83)

Chlorine (ASTM SW846-9020 [modified]):

Volatile Chlorine: AP

Total Chlorine : .45

Analysis Certified by . M. B. C.

Transport Road Laboratory

Time Faxed: 75 am pm

2777 Broadway Avenue, Cleveland, OH 44115 Tel: 216 623-8383 FAX: 216 623-8393

Date: 3 / 25 /1996
Shipper # . CUSIO

Moisture & Chlorine Analysis

Moisture: O. S. (ASTM D93-83)

Chlorine (ASTM SW846-9020 [modified]):

Volatile Chlorine : <u>いり</u>

Total Chlorine : 109.

Analysis Certified by . 4.8. Care

Transport Road Laboratory

Time Faxed: 5 am pm

September 12, 1994

Kevin Pierard
United States Environmental
Protection Agency, Region 5
RCRA Enforcement Branch
77 West Jackson Boulevard
Chicago, IL 60604

Re: RCRA Section 3007 Information Request LTV Steel Company, Inc. Cleveland Works Facility OHD 004 218 673

Dear Mr. Pierard:

Attached is the response of LTV Steel Company, Inc. to the above-referenced information request.

The responses to the information requested have been limited to information pertinent to the excavation of the #1 sedimentation pond at LTV Steel's Cleveland Works solid waste disposal facility. The responses were limited based on a telephone conversation on August 11, 1994 between Dale Papajcik and you. The attached information includes all responsive information provided to the undersigned counsel for LTV Steel by individuals familiar with the subject matter of the request.

If, after analysis of the attached responses, U.S. EPA requires any additional explanation of the responsive materials or further information, please contact the undersigned at (216) 622-5628.

Respectfully submitted,

LTV STEEL COMPANY, INC.

By:

Dale E. Papajcik' Senior Attorney

DEP/CMF3542 attachments

RCRA Section 3007 Information Request
LTV Steel Company, Inc.
Cleveland Works Facility
Cleveland, Ohio
Dated: August 3, 1994

### Introductory Note:

LTV Steel Company, Inc. received the above-referenced Information Request on August 8, 1994 via CT Corporation System, Cleveland, Ohio. On August 11, 1994, Dale E. Papajcik contacted U.S. EPA to seek clarification of the scope of information sought by the request and to identify which LTV Steel facility the request was directed. Mr. Papajcik spoke with Kevin Pierard of U.S. EPA. Mr. Pierard indicated U.S. EPA was interested in tar-like material encountered in an excavation (LTV Steel Cleveland-East, EPA ID No. OHD 004 218 673) and sent to the Kurtz Brothers landfill (4700 E. 49th Street, Cleveland, Ohio) in April, 1993. Mr. Papajcik and Mr. Pierard agreed that the scope of LTV Steel's responses would be limited accordingly. Mr. Papajcik indicated LTV Steel would attempt to respond by September 1, 1994. Due to previously scheduled vacations and other environmental agency related requirements, LTV Steel is responding on the date noted on the cover letter accompanying this response. Dale Papajcik attempted to contact Ms. Rita Cestaric by phone mail message regarding this response from September 6-8. It was not until late on September 8 that Mr. Papajcik found that Ms. Cestaric was no longer employed by U.S. EPA.

LTV Steel owns and operates, at its Cleveland Works, a permitted solid waste disposal facility. The facility has been in operation since prior to 1967 for the disposal of non-hazardous air and water pollution control dusts and The permitted facility is located amid an historic construction and demolition debris and slag fill area. attached Document 2). As part of the construction of a cap and storm water control system for the permitted disposal facility, LTV Steel, through its contractors, was required to excavate a number of sedimentation ponds. (See attached Document 2). During the excavation of the #1 sedimentation pond, LTV Steel encountered tar or tar-like materials in the excavated fill The responses provided below are limited to the material. activities involved in the excavation of the #1 sedimentation pond the disposition of the excavated materials and the general background of LTV Steel's production of coal tar materials.

### LTV STEEL RESPONSES

- 1. L. A. Szuhay, LTV Steel
  - S. Rihtar, LTV Steel
  - J. C. Holton, LTV Steel
  - R. L. Nemeth, LTV Steel
  - T. M. Girdler, III, LTV Steel Gary Samerigo, Kurtz Brothers
- 2. All documents consulted, examined or referred to in the preparation of the answers to this information request are attached hereto.
- 3. Donald Rooney Great Lakes Construction Company Walter Rakovich Operations Manager, Enviroserve, J.V. Joe Lynch Sanitarian, Cuyahoga County Board of Health
- 4. LTV Steel Company, Inc. (Cleveland Works-East Facility) 3100 E. 45th Street Cleveland, Ohio 44127 OHD 004 218 673
- 5. LTV Steel Cleveland Works (East and West) employs approximately 6,500 people. Hundreds of employees may have knowledge or information with respect to solid waste management at the facility. However, the LTV Steel employees who have responsibility for various solid waste management issues at the facility are identified in response 1.
- 6. Please refer to the introductory note and the response to question #7.
- 7. As noted above, LTV Steel is responding to this request for information only with respect to the tar-like material encountered during excavation of the #1 sedimentation pond. Tar-like materials encountered at the #1 sedimentation pond most likely originated at one of the coke plants operated by LTV Steel or its predecessors from around the turn of the century. All LTV Steel Cleveland cokemaking operations ceased in December, 1992.

The tar-like materials encountered in the #1 pond excavation most likely originated from somewhere in the Cleveland facility coal and coke by-products recovery process area sometime prior to 1980. Attached as Document No. 1 is a document describing the processes which generate listed hazardous wastes from coke plant by-products operations. Coke by-products were produced by LTV Steel and its predecessor companies from the first half of this

century until 1992. During such time, coal tar and other by-products were produced for sale to coal tar refiners and other users. Some of these products, and associated materials, may have required disposal from time to time; possibly, in the area of the excavation of the #1 sedimentation pond. In addition, the material encountered in the excavation may have originated from historic maintenance or construction activities in coke plant areas. From November 19, 1980 until late 1992, the LTV Steel facility generated coal tar decanter tank sludge which, if not recycled pursuant to 40 CFR 261.4(a)(10), would be identified as KO87. However, since November, 1980, these materials have always been recycled within the scope of the noted exclusion.

LTV Steel began shipping coke by-product plant materials from its idled Cleveland coke facility to LTV Steel's Warren, Ohio coke facility on August 3, 1993. The materials are mixed with coal in a containment area on site before transport to Warren. There, the material is recycled by reinsertion to the coke ovens for use as feedstock in the coking process.

The materials mixed with coal and transported to Warren for use as feedstock, if disposed, could be classified as a listed cokemaking hazardous waste. Pursuant to 40 CFR 261.4(a)(10), these materials are specifically excluded from the definition of solid waste and consequently, excluded from regulation from the point of generation to the point of recycle. Pursuant to Section 3006 of RCRA, 40 CFR 261.4(a)(10) took effect in Ohio at the same time it took effect at the federal level (i.e. February 18, 1993). LTV Steel has no information indicating that coal tar or related materials have been disposed in the area of the #1 sedimentation pond since prior to 1980. The origin of the material cannot be determined.

- 8.(a) See attached Document Package 2 for maps of LTV Steel's on site solid waste management facility to which the #1 sedimentation pond is attendant. Please also see attached Document 3 which is a CERCLA §103(c) notification.
  - (b) Non-hazardous air and water pollution control dusts and sludges. Please refer to Document Package 4.
  - (c) No hazardous wastes have been disposed at the solid waste management facility. Some material excavated from the #1 sedimentation pond was placed in rolloff boxes immediately adjacent to the #1 sedimentation pond and

then transferred to trucks for disposal at the Envirosafe landfill in Oregon, Ohio.

- (d) Please refer to Document 5. Excavations of a sedimentation pond associated with an industrial waste landfill closure.
- (e) Please refer to Document Package 7. (Great Lakes Construction project logs.)
- 9. Excavation on April 27, 1993 was being carried out on the south side of the #1 sedimentation pond (see Document 5) by an excavator and several dump trucks. There was a member of the LTV Steel Labor Department watching for tar-like material standing at the top of the excavation south of the excavator. The excavator was removing C&D type material (bricks, cement chunks, scrap metal, and dirt) and emptying it directly into tri-axle dump trucks that wee transporting it directly to Kurtz on E. 49th Street.

Tom Girdler received a call from Stan Rihtar that the County landfill inspectors had found tar-like material freshly deposited at the Kurtz landfill. All excavation immediately stopped. The landfill operator climbed onto the most recently filled truck still on site and smelled tar. This truck was held. The operator drove to Kurtz by a shortcut and arrived before any further trucks were unloaded. He sent these trucks back to the construction site loaded. All trucks were unloaded back into the excavation and the equipment decontaminated by Enviroserve JV. before further use. See also, Document Packages 8 and 12.

- 10. a. Various steel mill construction and demolition debris wastes from anywhere in a steel mill and apparently coke plant related tar.
  - b. See Documents 9, 12 and 14 for an analysis of the tar contaminated material.
  - c. South bank, center, approximately 4 to 8 feet deep. See Document 5.
  - d. There was no apparent segregation of wastes in this area. Material was a mixture of bricks, scrap, dirt, sand, cement chunks, and some tar-like material.
  - e. There was no apparent method of segregation.

- 11. a. The method of transportation was tri-axle dump truck.
  - b. Silver Arrow truck lines and Moribito Co. were subcontractors for Stein Co. and did the hauling. Silver Arrow hauled all the waste containing tar-like material to Kurtz. Refer to Document Package 10.
  - c. See Document 11.
  - d. See Document Package 10.
  - e. It is estimated that 16,000 cubic yards of material was excavated from the #1 sedimentation pond. Approximately 100 cubic yards (200,000 lbs.) was directed from the Kurtz landfill to Envirosafe Services of Ohio. The total amount of material directed to the Kurtz Brothers landfill from the #1 sedimentation pond excavation is unknown. However, truck delivery tickets for the material delivered to Kurtz are attached as Document Package 10.
- 12. See responses to questions 7 through 11.
- 13. See Documents 9 and 13.
- 14. See responses to questions 7 through 11.
- 15. All information provided by the individuals identified in response #1 has been included in the above responses.

[DEP/CMF3538]



June 8, 1993

Mr. Murat Tukel
Ohio Environmental Protection Agency
Northeast District Office
2100 East Aurora Road
Twinsburg, Ohio 44087

Dear Mr. Tukel:

Subject: LTV STEEL COMPANY, INC. - CLEVELAND WORKS
POND EXCAVATION

The following is provided in response to your letter of May 24, 1993 (attached), requesting documentation associated with the excavation of No. 1 sedimentation pond at LTV's Cleveland Works landfill.

On April 27, 1993, a contractor for LTV Steel hauled nine truckloads of excavated soil to the Kurtz Brothers landfill located at 4700 East 49th Street, Cleveland, Ohio. Please note specifically that the material directed to Kurtz was soil containing limited organic matter and larger pieces of gravel, slag and crushed bricks. This material was not waste. Upon arrival at the Kurtz facility, it was discovered that some of the soil contained a tar-like substance. Cuyahoga County Health Department discovered the tar-like material on April 27, 1993 and notified LTV Steel accordingly on the same day. LTV Steel understands that Ohio EPA inspected the Kurtz landfill on April 28, 1993.

Immediately upon notification by the County, an LTV Steel representative was dispatched to the Kurtz landfill and immediately thereafter directed Enviroserve, J.V. to segregate any tar-like material from the nine loads of soil. On April 27, Enviroserve, J.V. began the segregation operations. All material was then shipped to the Envirosafe Services of Ohio, Inc. (ESOI) facility in Oregon, Ohio.

The primary goal was to remove the tar-like material from the Kurtz landfill as quickly as possible and have it disposed in a safe manner. It was assumed the material was properly identified, based on assumed knowledge of the waste tar-like material as a USEPA listed hazardous waste, K141. Based on this assumption, there were no samples of the tar-like material taken to further characterize this waste. Unfortunately, after further review, LTV has been able to develop little evidence indicating that the disposed material was in fact a K141 waste.

Mr. Tukel June 8, 1993 Page 2

The USEPA description of listed wastes are very specific. The USEPA description of K141 waste in 40 CFR 261 is as follows:

Process residues from the recovery of coal tar, including but not limited to tar collecting sump residues from the production of coke or the recovery of coke by-products.

The preamble to USEPA's August 18, 1992 rule establishing K141 as a listed waste is very specific in identifying tar collecting sump residues as K141 wastes. In addition, USEPA background documents to the August 18 rule identifies K141 as being generated only from tar collecting sumps or some other phase of the coke by-product recovery operation. Despite the language "Process residues from the recovery of coal tar <u>including but not limited</u> to tar collecting sump residues", the only reading of the rule that is rational is that K141 must be generated from a tar collecting sump or some other very closely related piece of equipment in a Coke Plant by-product facility. Except for the visual observation that the material discovered at the Kurtz landfill contained a tar-like material, LTV Steel has no evidence that the material originated in a Coke Plant tar collecting sump or closely related piece of processing equipment.

Therefore, although LTV Steel acted in the most environmentally responsible manner under the circumstances, LTV Steel believes the designation of the tar-like material as K141 may have been in error. It would have been more appropriate to run the TCLP analysis on the material for more precise characterization.

With respect to the statement that LTV Steel failed to evaluate its wastes before their disposal as required by OAC-3745-52-11, it is imperative that Ohio EPA understand that excavated soil materials of the type encountered at Yucca Flats are not wastes subject to OAC-3745-52-11.

Also provided herein is LTV Steel's response to Ohio EPA's enumerated requests for documentation in its May 24 correspondence.

1. At this time, no further excavations are planned in the Yucca Flats area. However, if future excavations do occur, LTV Steel, where appropriate, will conduct on site monitoring by placing observers in the area of the excavation to prevent tar-like material from being inadvertently transported off site.

- 2. Attached are LTV Steel's test results from May 13, 1993 which are an example of LTV Steel's testing methodology for wastes undergoing TCLP analysis. Prior to identifying a waste as a listed hazardous waste, a detailed investigation must occur concerning where the waste originated. With historic contamination, it is generally impossible to determine the specific point of generation of a hazardous material. Therefore, in most situations, it will be appropriate to perform the TCLP analysis to determine if a material should be classified as a hazardous waste.
- 3. Attached are hazardous waste manifests which document disposal of the tar-like contaminated material at ESOI landfill during the week of April 27, 1993.

After Ohio EPA has had an opportunity to review this letter and analyze the attachments, LTV Steel would like to meet with Ohio EPA to discuss this matter in greater detail.

In the interim, should you have any questions, please call me at (216) 429-6370.

Sincerely,

LTV STEEL COMPANY, INC.

R. L. Nemeth

Manager

Environmental Control Department

RLN:db

Attachments

CERTIFIED - RETURN RECEIPT



State of Ohio Environmental Protection Agency

**Northeast District Office** 

2110 E. Aurora Road rinsburg, Ohio 44087-1969 (6) 425-9171 FAX (216) 487-0769



ENVIRONMENTAL CONTROL DEPT.
CLEVELAND WORKS

George V. Voinovich Governor

May 24, 1993

RE: LTV STEEL COMPANY, INC.

OHD 046 203 774 CUYAHOGA COUNTY

LQG

NOTICE OF VIOLATION

### CERTIFIED MAIL

Mr. R. L. Nemeth Superintendent Environmental Control LTV Steel Company 3100 East 45th Street Cleveland, Ohio 44127

Dear Mr. Nemeth:

On April 27, 1993, this office received a complaint (Complaint # 4155) alleging that LTV Steel Company disposed of nine (9) truck loads of hazardous waste at Kurtz Brothers Landfill located at 4700 East 49th Street, Cleveland, Ohio. Mr. Scott Winkler (DSIWM) and I conducted an investigation at the Kurtz Brothers Landfill on April 28, 1993. At the time of the investigation Mr. Gary Samerigo of Kurtz Brothers, Inc. accompanied us at the site.

On April 27, 1993, LTV Steel Company sent nine (9) truck loads of Sedimentation Pond #3 excavation material to the Kurtz Brothers Landfill. Upon arrival, these materials were identified as tar contaminated soils (K141 wastes) as some tar like material was observed within the loads. LTV Steel Company and its contractor, Envirosafe were immediately notified. On April 28, 1993, Envirosafe started segregating all the waste from the nine loads disposed of on April 27, 1993 and hauled them to its Oregon, Ohio TSD facility manifested as K141 hazardous wastes.

Coal tar contaminated soils are listed as K141 hazardous wastes under the Code of Federal Register (CFR) 40 CFR 261.33. This waste code has not yet been promulgated under the Ohio Administrative Codes (OAC). It appears that LTV Steel Company has violated federal regulations by disposing K141 hazardous wastes to a solid waste disposal facility. This matter is being forwarded to the U.S. EPA Region V for further review, consideration and action if necessary.

LTV Steel Company has also violated Ohio Administration Code (OAC) 3745-52-11 by failing to evaluate its wastes before their disposal. This is a repeat violation from LTV Steel's Sedimentation Pond #4 excavation project (see Ohio EPA's October 1, 1992 letter).

Mr. R. L. Nemeth May 24, 1993 Page Two

Ohio EPA requests the following documentation in order to further evaluate the incident and LTV Steel's compliance with the state and federal hazardous waste rules and regulations:

- 1) LTV Steel Company shall submit a revised protocol of standard operating procedures for conducting excavations at the Yucca Flats area in order to prevent these violations from reoccurring.
- 2) LTV Steel shall submit screening and/or testing methodologies addressing both listings and characteristics of hazardous wastes encountered from the sedimentation pond excavations.
- 3) LTV Steel shall submit the proper disposal documentation (manifests) of waste materials that were segregated and sent to the Envirosafe facility during the week of April 27, 1993.

Ohio EPA's October 1, 1992 letter still represents this Agency's position on this matter. Please be advised that Ohio EPA reserves the right, pursuant to Chapters 6111 and 3734 of the Ohio Revised Code and any other applicable state and federal law or regulation, to require further site investigation and remediation to address releases into the environment of hazardous waste, hazardous substances, industrial wastes, pollutants or contaminants at the facility.

Please respond to this letter and submit the above mentioned documentation to this office by June 8, 1993. If you should have any questions regarding this letter, please do not hesitate to call me at (216) 963-1192.

Sincerely,

Murat Tukel

Environmental Engineer

Division of Hazardous Waste

Management

MT/fwn

CC: Paul Anderson, DHWM, NEDO
Harry Courtright, DHWM, NEDO
Nancy Zikmanis, DHWM, NEDO
Laurie Stevenson, DHWM, CO
Scott Winkler, DSIWM, NEDO
B.J. Meder, Cuyahoga Health Dept.



# ENVIRONMENTAL CONTROL LABORATORIES INC.

21845 Drake Road Strongsville, Ohio 44136 (216) 238-6100 FAX: (216) 238-0395

Mr. Stan Rihtar	Page 1 of 2	E.C. Lab #: Sample Date:	93051007 5/7/93
LTV Steel Company Environmental Control Dept. 3100 East 45th Street		Received Date: TCLP Extract Date: Analysis Date: Report Date:	5/10/93 5/11/93 5/13/93 5/14/93
Cleveland OH 44127		Matrix:	Solid

Report Covering Analysis of: Pond #1 Sewer Excavation

TCLP VOLATILES *		93051007-1	OPM	Bias
Method SW846 8240	Detection	Pond #1 Sewer Exv.	SPK	Corrected
Compound	Limit-ppm	Results-ppm	Recovery	Value
Vinyl Chloride	0.01	BDL	•	-
1,1-Dichloroethene	0.005	BDL	-	-
•	0.05	BDL	-	-
2-Butanone(MEK) Chloroform	0.01	BDL	-	-
Carbon Tetrachloride	0.005	BDL	-	-
Benzene	0.005	BDL	-	-
1,2-Dichloroethane	0.005	BDL	-	-
Trichloroethene	0.005	BDL	-	-
Tetrachloroethene	0.005	BDL	•	-
Chlorobenzene	0.005	BDL	•	-

	Acceptable	Percent
Surrogates	Range	Recovery
1,2-Dichloroethane-d4	76-114	78
Toluene-d8	88-110	96
4-Bromofluorobenzene	86-115	92

Note: BDL (Below Detection Limit)

* Extraction: Method SW846 1311



## ENVIRONMENTAL LABORATORIES INC.

21845 Drake Road Strongsville, Ohio 44136 (216) 238-6100 FAX: (216) 238-0395

Mr. Stan Rihtar	Page 2 of 2	E.C. Lab #: Sample Date:	93051007 5/7/93
TOTAL Care of Commons		Received Date:	5/10/93
LTV Steel Company Environmental Control Dept. 3100 East 45th Street		TCLP Extract Date:	5/11/93
		Extraction Date:	5/12/93
<del>-</del>		Analysis Date:	5/13/93
Cleveland OH 44127		Report Date:	5/14/93
		Matrix:	Solid

Report Covering Analysis of: Pond #1 Sewer Excavation

TCLP SEMI-VOLATILES * Method SW846 8270	Detection	93051007-1 Pond #1 Sewer Exv.	SPK	Bias Corrected Value
Compound	Limit-ppm	Results-ppm	Recovery	Value
Cresol	0.02	BDL	•	-
1,4-Dichlorobenzene	0.01	BDL	-	-
Hexachiorobenzene	0.01	BDL	-	•
Hexachlorobutadiene	0.01	BDL	•	-
Hexachloroethane	0.01	BDL	-	-
2,4-Dinitrotoluene	0.01	BDL	-	•
Nitrobenzene	0.01	BDL	-	-
	0.05	BDL	-	-
Pentachlorophenol	0.02	BDL	-	•
Pyridine	0.01	BDL	-	•
2,4,5-Trichlorophenol 2,4,6-Trichlorophenol	0.01	BDL	•	-

	Acceptable	Percent
Surrogates	Range	Recovery
2-Fluorophenol	21-100	46
Phenol-D6	10-94	31
Nitrobenzene-D5	35-114	98
2-Fluorobiphenyl	43-116	63
	10-123	89
2,4,6-Tribromophenol P-Terphenyl-D14	33-141	97
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Note: BDL (Below Detection Limit) • Extraction: Method SW846 1311

Signed:

Lab Manager

		N ₀	064686							
	WASTE MANIFEST	1. Generator's US EPA ID No. O H D 0 0 4 2 1 8 6 7 3	Manifest Document No. 6.4.5.8.6	2. Page 1 of 1	Information in the not required by Fe					
ĬÌ	3. Generator's Name and Mailing Address LTV STEEL CO. ENV. CONTROL DEPT. 3100 EAST 45th STREET CLEVELAND, OHIO 44127 4. Generator's Phone (216) 429-6370		· .	8. State Gene		§4686 \				
	5. Transporter 1 Company Name  DART TOUCKING CO.	6. US EPA ID N	36.58.25	C. State Transporter's ID D. Transporter's Phone						
	7. Transporter 2 Company Name	8. US EPA ID N	<u> </u>	E. State Transforte  F. Transporte  G. State Facil	r's Phone   -800	- <b>5</b> 33085				
	9. Designated Facility Name and Site Address Envirosafe Services of Ohio 876 Otter Creek Road Oregon, Ohio 43616	· =		H. Facility's P						
	11. US DOT Description (Including Proper Shipping I		12. Cont No.	toiners .	13. 14. Total Unit wantity W1/Vol	i. Waste No.				
	o. X RQ Hazardous Waste, ORM-E, NA 9189 (K1		001	1 nm	ST-	K141				
GENERAT	b.									
RATOR										
ĺ	d.									
	J. Additional Descriptions for Materials Listed Abov  Coal Tar - Contaminated So			K Handling	Codes for Wastes List  Sc. Le	sted Above				
	15. Special Handling Instructions and Additional In 11a. GSN 11637-012 24-Hr. Emergency Contact 4	£ 62 + 37 419/691-0016	54.G1 4938	ENV 3100 CLE	L COMPLETED S STEEL IRONMENTAL CO EAST 45th STRE VELAND, OHIO 4	ONTROL DEPT. EET 14127				
	16. GENERATOR'S CERTIFICATION: I hereby declar marked, and labeled, and are in all respects in proper #1 am a large quantity generator, I certify that I have a end that I have selected the practicable method of treat OR, if I am a small quantity generator, I have made a	a program in place to reduce the volume and toxicit	ity of waste generated to	to the degree I have	ve determined to be eco	nomically practicable and the environment;				
V	efford. Printed/Typed Name S. Rihtar		- Pil	'حرب	<u>&gt;                                    </u>	9.4 12.8 19.3				
	Printed/Typed Name Printed/Typed Name REPUBLIES Printed/Typed Name REPUBLIES Printed/Typed Name Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Receipt of Rec	Signature	1.1.	Ronk	` .	O. Y.J. 8 19.3				
	R Printed/Typed Name	Signature				Month Day Year				
	19. Discrepancy Indication Space BOX 13 added per W	ally Rakovich - 9 4-28-9	′ <del>-</del>	u mari i i	10					
	20. Facility Owner or Operator: Certification of re	eceipt of hazardous materials covered by th	nis manifest except (	us noted in Item	<del></del>	Month, Day Yan				
	primed Typod Name Inter	Tree Do	le M	70		24126165				
		ORIGINAL — RETURN TO	GENERATOR "							

				NY	064	031	:			Commercial Section Section
		UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US E Q H. D. O. O. 4	PA ID No. . 2 1 8 6 7 3	I D	ifest ent No. 5 · 8 · 7	2. Pag of			shaded areas is deral law.
1	3. (	Generator's Name and Mailing Address LTV STEEL CO. ENV. CONTROL DEPT 3100 EAST 45th STREET CLEVELAND, OHIO 44127	•				<u> </u>	HD Nº HD Nº Ie Generator's ID	06	4687
Í		Generator's Phone ( 216 ) 429-6370		C. Sta	te Transporter's ID	<b>エク</b> 2	sserk.			
	5.	Transporter 1 Company Name  DART TRUCKING CO	Tru lo	1 OI A93 2U 3. <i>P.O.O.A.H.</i>		825	D. Tra	nsporter's Phone it		
	7.	Transporter 2 Company Name								
	_	a hand Emille Name and Cite Address	<u> </u> 10	. US EPA ID I	Number	• •		nsporter's Phone ite Facility's ID		
		Designated Facility Name and Site Address Envirosafe Services of Ohi 876 Otter Creek Road		H. Fac	cility's Phone	:100				
	1	Oregon, Ohio 43616	<del></del>	H.D.O.4.5.2	2 .4 .3 .	7 .0 .6 12. Conto	niners	419/255-5	14.	
	11.	. US DOT Description (Including Proper Shipping	Name, Hazard Class,	and ID Number)		No.	Type	Total Quantity	Unit Wt/Vol	l. Waste No.
	a.	X RQ Hazardous Waste	, Solid, N.O (41)	.s.		001	DΤ	4.65.00	P	K141
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RATOR	1					• •	•			
	d								V	and About
	1.	Additional Descriptions for Materials Listed Abo					K. Ho	ndling Codes for V	rastes Lis	NEG ADOVE
		Coal Tar - Contaminated S	o11			(	V	JE D81		
		5. Special Handling Instructions and Additional 11a. GSN 11637-012 24-Hr. Emergency Contact	FR	•	708C	<i>7.</i>		MAIL COMPLICTY STEEL ENVIRONMEN 3100 EAST 45	TAL CC	NTROL DEPT.
		16. GENERATOR'S CERTIFICATION: I hereby deci- marked, and labeled, and are in all respects in pro- Milliam a large quantity generator, I certify that I have	pre that the contents of t per condition for transpo a program in place to re	his consignment are fully of ort by highway according duce the volume and taxio	and accurate to applicable try of waste to	enerated to	the deg	by proper shipping no national government tree I have determined	ome and a ol regulation of to be eco	re classified, packed, ons. nomically practicable and the environment;
		and that I have selected the procticable method of tre OR, if I am a small quantity generator, I have made afford.	a good faith effort to min	simize my waste generation	n and select	the wo	ste mana	agement method that		
	*	Printed/Typed Name S. Rihtan		Signature		万代	4	<u>t</u>	^	2.412.814.3
	RANS	17. Transporter 1 Acknowledgement of Receipt of Printed/Typed Name  GLAN KOFFAN		Signature	Mal	Yoff.	/	9/2		North Day Year
	Ö	18. Transporter 2 Acknowledgement of Receipt of Printed/Typed Name	t Materials	Signature		f		- John Tolland		Month Day Year
	Ē	19. Discrepancy Indication Space				<del></del>				
	FAC-	·				<b></b>			<u></u>	
A	L	20. Facility Owner or Operator: Certification of	receipt of hazardous	materials covered by	Kis manife	Y Z	Tipled	in Nem 19.		1
	Ÿ	Printed/Typed Name	KKE	Signature	M	<u> </u>	<u>                                      </u>	A STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STATE OF THE STA		71277P
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	3.	Ger	WASTE MANIFEST nerator's Name and Mailing Address	,	A. State Manifest Document Number							
	ı +		LTV STEEL CO. ENV. CONTROL DE		B. Sto	te Gener	rator's 1D	<u>U.</u>	1100			
			CLEVELAND, OHIO 44127 nerator's Phone ( 218 ) 429-6370	porter's ID								
	5	Tro	nsporter 1 Company Name ART TRUCKING C			lumber , 6.5.	825	_				0-53302
	7.	رر. Tra	Insporter 2 Company Name		A ID N	umber			te Transj nsporter	porter's fD 's Phone		-
	9	Des	signated Facility Name and Site Address		A ID N	lumber	• •		ate Facili			
	]	Env	virosafe Services of Ohi 6 Otter Creek Road	lo, Inc.				H. Fa	cility's Ph	one		
Oregon, Ohio 43616 [O. H. D. O. 4. 5. 2. 4. 3. 7. 0. 6] 419/255-5100												
		. U	S DOT Description (Including Proper Shippi	ng Name, Hazard Class, and ID Numbe	r)		12. Confe No.	giners Type	To	13. otal ontity	14. Unit Wt/Vol	I. Waste No.
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		24	4-Hr. Emergency Contact	419/691-0016		511	1607	>	3100 E CLEVE	ast 45th Land, C	Stree HIO 44	t  127
	;		BENERATOR'S CERTIFICATION: I hereby disacked, marked, and labeled, and are in all resp	acts in proper condition for manaport by my	IWGJ OL	coroning to	appacaois.				•	
		#	f I am a large quantity generator, I certify th	at I have a program in place to reduce	the vok	ume and	toxicity of v	availab doliava	meranea i Le to me	which mini	mizes the	present and future
			sconomically practicable and that I have select fereat to human health and the environment; ( waste management method that is available to m	or, if I am a small qualitity generator, I and that I can afford.	11076 111	V	- 10m en	<b>уп 10 f</b>	MANUAL TO	·y #05/4 9/		lonth Day Year
١	V	P	Printed/Typed Name S. Rihtan	Signatur		٧. (	KU	tt	ar,			54 28 153
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	200	-	Frinted/Typed Name  JOHN K UIGNOSS	Signatur	Zu	us	1/14	evl	<u> </u>			1.412.819
	ום		Transporter 2 Acknowledgement of Receipt	of Materials Signature				w				South Day Year
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		19.	Discrepancy Indication Space	•								•
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	ç	20.	Facility Owner or Operator: Certification of	receipt of hazardous materials covere	d by th	is manife	st except o	s noted	in Item	19.		
	٧		Printed/Types Name	Signatu	1	0		n :	$\overrightarrow{H}$	*	7	5(/12019)
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ORIGINAL - RETURN TO GENERATOR

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11		ransporter 1 Company Name	· · h	6.	US EPA ID I	-	816		ite Transpo insporter's			~>>~)<<
	7 Transporter 2 Company Name 8. US EPA ID Number E. State Transporter's ID											
П	P. Fransporter's Phone											
	9. Designated Facility Name and Site Address Envirosafe Services of Ohio, Inc. 876 Otter Creek Road Oragon Ohio 43616  Q H D. O. 4. 5. 2. 4. 3. 7. 0. 6  419/255-										5100	·
	11	regon, Ohio 43616  US DOT Description (Including Proper Shipping	Name, Hazard Cl				12. Conf	1	13.		14. Unit	ί.
		HM					No.	Туре	SST. Pa		WI/VOI Ched	Waste No.
	a.	RQ Hazardous Waste, ORM-E, NA 9189 (Kla		0.8.			00 j	DŢ	4.5.0	.0.0	P	K141 130
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	10	GENERATOR'S CERTIFICATION: I hereby decl	are that the conten	ats of this co					bove by pro ional and no	oper ship tional go	ping name	and are dassified, I regulations.
		If I am a large quantity generator, I certify that economically practicable and that I have selected	I have a program the practicable m , it I am a small o	i in place t ethod of tri quantity get	o reduce the vi	DOD GATUR	SOCIETY OF	ادائمت	de to me w	hick min	imizes the	present and future
Ì	$\parallel$	waste management method that is available to me waste management method that is available to me Printed/Typed Name  S. Rihtar	310 1101 1 101		Signature	).	Rih	ta	100			onth Day Year 412.9193
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į		Printed/Typed Name  FRED  8. Transporter 2 Acknowledgement of Receipt o	LOM Materials			ree	<u> </u>	\ <i>J</i>	om		b	412.919.3
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		9. Discrepancy Indication Space										
-10 mg	<u> </u>	20. Facility Owner or Operator: Certification of r	eceipt of hazardo	ous materia	sis covered by	this manif	est except.	es note	d in Item 19	9.		
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11	7. Transporter 2 Company Name  8. US EPA ID Number  E. State Transporter's ID												
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П	E	Invirosafe Services of Ohio	, Inc.										
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	11.	US DOT Description (Including Proper Shipping	g Name, Hazard (	Class, and ID Nu	ımber)		12. Cont No.	Type		13. Fotal Jan <del>tity</del>	14. Unit Wt/Vol	L Waste	No.
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ı	1:	<b>24-Hr</b> . Emergency Contact 4	19/691-00	16		<b>W</b>	•			EAST 45th Eland, C			
		<ol> <li>GENERATOR'S CERTIFICATION: I hereby dec packed, marked, and labeled, and are in all respect</li> </ol>		at al this consider	ment are ful	ly and oc	curately desc	nbed a	bove by	proper ships	ping name	and are de	ossified,
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		threat to human health and the environment; On waste management method that is available to me	and that I can affor	d		V	<i>n</i>						
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		20. Facility Owner or Operator: Certification of r	eceipt of hazard	ous materials co	vered by th	ns manife	st except a	s noted	in Hem	1 <b>7</b> .			
	r	Frintad/Typed Name		Sig	רשליש	Q					.*	lorith Day	Year
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ᅱ	3. 0	WASTE MANIFEST Generator's Name and Mailing Address	10 11 0 0 0	<u> </u>		4 (	· · · · · · · · · · · · · · · · · · ·	A. Sta	te Manifest Docum	ent Num	ber .		
, j		LTV STEEL CO. ENV. CONTROL DI	EPT.			٠.		Ų	HD VA	<u> </u>	7715		
۱۱		CLEVELAND, OHIO 44127						B. State Generator's ID					
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	ر "	MOSCOW BYLK 10.H.D.9.8.70.2.1							insporter's Phone		& 36 - 6187		
$\  \ $	7.	Transporter 2 Company Name	lumber			ite Transporter's ID	) <del></del>						
	<u>_</u>	Designated Facility Name and Site Address 10. US EPA ID Number						F. Transporter's Phone G. State Facility's ID					
	E	Envirosafe Services of Ohio, Inc.											
	8	876 Otter Creek Road Oregon, Ohio 43616 [O. H. D. O. 4. 5. 2. 4. 3. 7. 0. 6]					7 0 6	H. Facility's Phone 419/255-5100					
	1	<u> </u>					12. Containers 13. 14.						
	11. US DOT Description (Including Proper Shipping Name, Hezerd Class, and ID Number)						No.	Туре	Total Quantity	Unit Wt/Vol	I. Waste No.		
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J. Additional Descriptions for Materials Listed Above  K. Handling Codes for V								indling Codes for \	Wastes Li	sted Above			
Coal Tar - Contaminated Soil													
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[ [ [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ]								\D14 TO					
	14	<ol> <li>Special Handling Instructions and Addition</li> <li>GSN 11637-012</li> </ol>	ial Information ERG	±3/	47	160	) l.		MAIL COMPLE VIV STEEL				
		24-Hr. Emergency Contact			)7 Ka	 			ENVIRONMENT 3100 EAST 45t	th Stree	t		
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16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper spacked, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national							our our menour de						
		If I am a large quantity generator, I certify	quantity generator, I certify that I have a program in place to reduce the volume and toxicity of clicable and that I have selected the practicable method of treatment, storage, or disposal current health and the environment; OR, if I am a small quantity generator, I have made a good faith a						waste generated to the degree I have determined to be available to me which minimizes the present and future				
	1	these: to human health and the environment; waste management method that is available to	OR, if I am a small q	nauma Beu	erator, I have it	ade a go	oa taith eff	ort 10 fi	minimize my waste g	eneration			
V	1	Printed/Typed Name S. Rihta			Signature	7	11/1	11	y	۸ اب	North Day Year		
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	Ļţ	20. Facility Owner or Operator: Certification	of receipt of hazardor	us materia	is covered by th	nanife	est except a	s notec	d in 100 9.		<del></del>		
	1	Bland Ward March	<del>()</del>	1	Signature	+		<del></del>	<del>/////</del>		York Por Your		
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	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID Q H D 0 Q 4 2.		Pocum 7.7.	nifest 9nt No 7 · 3 · 0	2. Por	not requir	ed by Fe	shaded areas is ideral law.		
	<ol> <li>Generator's Name and Mailing Address</li> <li>LTV STEEL CO. ENV. CONTROL DEP 3100 EAST 45th STREET</li> </ol>	т.				O	HD NO.	0.7	7730		
	CLEVELAND, OHIO 44127 4. Generator's Phone ( 216 ) 429-6370 5. Transporter 1 Company Name 6. US EPA ID Number					C. State Transporter's ID					
	MOSTOW BULK 10409.8.702.10.25										
	7. Transporter 2 Company Name 8. US EPA ID Number					E. State Transporter's ID  F. Transporter's Phone					
	9. Designated Facility Name and Site Address 10. US EPA ID Number Envirosafe Services of Ohio, Inc.					G: State Facility's ID hadden and had been a					
	876 Otter Creek Road Oregon, Ohio 43616   Q H D O 4 5 2 4 3 7 0 6						H. Focility's Phone				
	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)					iners Type	13. Total Quantity	14. Unit Wt/Vol	l. Waste No.		
	o. X RQ Hazardous Waste, ORM-E, NA 9189 (K1			No. 001	DT	4.6.150	P	K141			
— G⊞≱⊔	b.					•			A variorist Christa indestituto Mario Nova		
NERATOR	c.			•							
	d.				4				(a) (a) (b) (a) (b) (b) (b) (b) (b) (b) (b) (b) (b) (b		
	J. Additional Descriptions for Materials Listed Above  Coal Tar - Contaminated Soil  Coal Tar - Contaminated Soil										
	15. Special Handling Instructions and Additional Information ERG 31 470% P.  11a. GSN 11637-012  24-Hr. Emergency Contact 419/691-0016  3547  MAIL COMPLETED FORM TO: LTV STEEL ENVIRONMENTAL CONTROL DEPT. 3100 EAST 45th Street GLEVELAND, OHIO 44127										
	16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and lobeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.  W 1 am a large quantity generator, I certify that 1 have a program in place to reduce the volume and toxicity of waste generated to the degree 1 have determined to be economically practicable and that I have selected the practicable method of treatment, storage, and is properly available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have mode a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.										
ł	Printed/Typed Name S. Rihtar		Signature	D.1	Ri	h	tarn	۰ خ	19 3.0 9.		
TRAN	17. Transporter 1 Acknowledgement of Receipt of Printed/Typed Name	f Materials	Signature		/ /	/	<i>p</i> is	^ ما	tenth Day Year 0.413.019.3		
S P	18. Transporter 2 Acknowledgement of Receipt o	f Materials				<i></i>			710-11-2		
RANSPORTER	Printed/Typed Name		Signature						Nonth Day Year		
£40-4	19. Discrepancy Indication Space										
į	20. Facility Owner or Operator: Certification of a	eceipt of hazardous materi	als covered by th	nis mornife	st except d	noted	id hyda) 9.	,			
	Printed/Typed Name SERY	PICKE	Signature	4	_h	<u>L</u>	X	Ľ	3/3/33		
6. 6. 1		ORIGINAL — R	ETURN TO G	ENERA	OH ror	D					

May 17, 1993

Ms. Marcie Burrow Ohio State Emergency Response Commission Division of Emergency Remedial Response P.O. Box 1049 1800 WaterMark Drive Columbus, Ohio 43266-0149

Dear Ms. Burrow:

Subject: LTV STEEL COMPANY, INC. - CLEVELAND WORKS INCIDENT IDENTIFICATION NO. 9304-18-1580

Attached is a follow-up report for the verbal report of a tar release which occurred on April 27, 1993. The report format follows that of the attached Ohio Environmental Protection Agency questionnaire and the answers have been numbered accordingly.

Please call me at (216) 429-6396 if you have any questions or require additional information regarding this matter.

Sincerely,

S. Rihtar

Environmental Engineer

Environmental Control Department

SR:db

Attachment

CERTIFIED - RETURN RECEIPT

cc & attm.: Mr. Murat Tukel - OEPA, Twinsburg

Mr. B. J. Meder - Cuy. Co. Bd. of Health Ms. Joanne Hartman - Cleve. Dept. of Health

This is your company's opportunity to explain in its own words, the circumstances and actions relating to the release of pollutants to the environment. If any of the following questions are not applicable to your incident, indicate NA for that item.

### 1. Reporting

- (a) Time and date of discharge/release.
- (b) Time and date of discovery that the discharge had occurred.
- (c) When and to who was the release first reported?
- (d) Indicate the identification number referenced in the cover letter.
- (e) Who notified Ohio EPA/U.S. EPA?

### 2. Location

- (a) Mailing address.
- (b) Location of discharge; County, Township and City.
- (c) Longitude and latitude if source was non-transportation. (or enclose copy of a portion of a U.S. GS map showing location)
- (d) Distance and direction from nearest intersection (or milepoint) if transportation related.

### 3. Product Release

- (a) Please give the common and technical name(s) of the material(s) released and CAS Number(s).
- (b) Is the product listed under Section 302 (a) of SARA Title III or CERCLA 102(a). (If yes, then a copy of your response to these questions should be sent to your LEPC).
- (c) What was the quantity and duration of the discharge. Indicate volume in gallons or pounds.

### 4. Environmental Impact

- (a) Did the product reach "Waters of the State:?

  Provide the name of the water course. (Underground waters are waters of the State.)
- (b) What was the length or area of the water affected?
- (c) If no water was affected, what was the surface area and depth of soil contamination. Please provide area of soil contamination even when waters are affected.
- (d) Did any evacuation result?
- (e) was any animal or vegetation damage observed?
- (f) Were any health effects reported? How many humans were exposed/injured?
- (g) Was medical advice provided for exposed individuals?

### 5. Monitoring and Detection

- (a) Describe how the release was detected and monitored to determine off-site concentration. (Be specific as to any monitoring system in place at your facility.)
- (b) If the release was airborne, how was the wind direction and speed determined?
- (c) Was the public warned and if so, how?

### 6. Mitigation, Containment Action

(a) How much product or waste was recovered or neutralized.

- (b) How was the material recovered or neutralized?
- (c) Where was the cleanup waste taken?
- (d) Were any other actions taken to reduce the impact of the discharge (boom, siphon dams, sorbent)?
- Please provide plans to eliminate any future spills discharges or emissions which may occur at this specific source. This m include; 7. employee training, replacement of equipment, construction, r security measures such as lighting, fencing or locks.

If this is the second oil spill at this location, or a sp .age of ove: 1,000 gallons which has reached water, then you must submit copies of your Spill Prevention Control and Countermeasure Plan (SPCC) to the USEPA Regional Administrator and to this Agency within 60 days from the time of the discharge as provided by 40 CPR 112.4. Your SPCC plan should be submitted with your response to this letter.

### 8. Health Risks

- (a) What protective precautions were taken as a result of the release?
- (b) List known or anticipated acute and chronic health risks of exposure to the substances which are released. Site source of information provided.
- Indicate any air, water, or other permit numbers which may be pertinent 9. to this incident. Please indicate type of permit(s).
  - (a) If this is an NPDES/air permit, please enclose a copy of your current effluent/emission limitations.
- 10. Provide a chronological review of the incident. Include a chronology of communications with state and local government agencies.
- Il. Provide any photographs, reports or other documents whether generated by your company or outside entities which are germane to the incident (e.g. accident reports, manifest, bills of lading laboratory analyses?)
- 12. Describe any extenuating circumstances which caused the discharge.
- 13. Economic Impact (This question is voluntary)
  - (a) What was the dollar value if any of the spilled product?
  - (b) What was the equipment damage cost?
  - (c) What were the costs of spill cleanup?
  - (d) What are the estimated costs of spill prevention to eliminate possible reoccurrence of this event?
- 14. Provide the name and title of the environmental contact(s) at your company and their telephone number.

### Submit your response within 30 days to:

Ohio EPA, Office of Emergency Response P.O. Box 1049, 1800 WaterMark Drive Columbus, Ohio 43266-0149

# LTV STEEL COMPANY, INC. INCIDENT I.D. NO. 9304-18-1580

### 1. Reporting

- a. Approximately 8:00 a.m. April 27, 1993
- b. 3:00 p.m. April 27, 1993
- c. 3:30 p.m. April 27, 1993 Reported to National Response Center.
- d. I.D. No. 9304-18-1580
- e. Ohio EPA notified by S. Rihtar, LTV Steel Co.

### 2. Location

- a. LTV Steel Company, Inc. 3100 East 45 Street Cleveland, Ohio 44127
- b. Cuyahoga County Kurtz Landfill, 5000 East 49 St. Cuyahoga Hts., Ohio 44125
- c. NA
- d. 5000 East 49th Street

## 3. Product Release

- a. Tar-contaminated soil, EPA Waste No. K141
- b. No
- c. Approximately 200,000 Pounds

## 4. Environmental Impact

- a. No
- b. NA
- c. Approximately 1,000 square feet, surface contamination only.
- d. No
- e. No
- f. None
- q. NA

## 5. Monitoring and Detection

- a. Visual
- b. NA
- c. NA

## 6. Mitigation, Containment Action

- a. 200,000 Pounds
- b. The material was scraped up with a front-end loader and placed into dump trucks and rolloff containers.
- c. Envirosafe Services of Ohio, Inc. Landfill
- d. NA

## 7. Plans to Eliminate Future Spills

Two employees have been assigned the duty of observing the excavation of #1 sedimentation pond for the presence of tar. They are positioned so that both the excavation and truck loading operations are monitored. If tar is encountered, appropriate material management will ensue.

- 8. <u>Health Risks</u>
  - a. None
  - b. NA
- 9. <u>Permits</u>
  Approved Permit to Install No. 02-5830 for LTV's Cleveland Works Landfill.

## 10. Chronological Review

- April 27, 1993 8:00 a.m. Tar-contaminated material was inadvertently transported and dumped at Kurtz Landfill.
  - 8:30 a.m. LTV discovered tarcontamination at #1 pond construction site during excavation.
  - 8:30 a.m. Ceased excavation of Pond #1.
  - 8:35 a.m. Enviroserve, J.V. was contacted to decontaminate excavating equipment.
  - 9:00 a.m. Enviroserve arrived and initiated equipment decontamination.
  - 3:00 p.m. Tar-contaminated waste material from LTV discovered at Kurtz Landfill during an inspection.
  - 3:00 p.m. Kurtz notified LTV of the tar contamination.
  - 3:05 p.m. Enviroserve, J.V. was contacted for remediation and decontamination of equipment.
  - 3:30 p.m. Enviroserve arrived at Kurtz Landfill and initiated cleanup.
  - 3:30 p.m. National Response Center notified (Report #170013).
  - 3:35 p.m. Ohio EPA Emergency Response notified.
  - April 28, 1993 8:30 p.m. Remediation completed.

- 11. Manifests are attached.
- 12. Extenuating Circumstances
  Approximately 100 tons of tar-contaminated construction and demolition material was inadvertently excavated during the construction of #1 sedimentation pond, loaded into trucks and transported to Kurtz Landfill. It was not until later that LTV discovered tar contamination during excavation. Immediately upon discovery of the contamination, operations ceased and remediation was initiated.
- 13. Economic Impact
  - a. NA
  - b. NA
  - c. \$23,000
  - d. NA
- 14. Environmental Contact
  Stan Rihtar, Environmental Engineer 216/429-6396
  Richard Nemeth, Manager 216/429-6370



LTV Steel Company

# ENVIRONMENTAL CONTROL



April 21, 1993

Mr. Tim Hickin
Ohio State Emergency Response Commission
Division of Emergency Remedial Response
P.O. Box 1049
1800 WaterMark Drive
Columbus, Ohio 43266-0149

Dear Mr. Hickin:

Subject: LTV STEEL COMPANY, INC. - CLEVELAND WORKS INCIDENT IDENTIFICATION NO. 9304-18-1379

Attached is a follow-up report for the verbal report of a tar release which occurred at our Cleveland Works on April 13, 1993. The report format follows that of the attached Ohio Environmental Protection Agency questionnaire and the answers have been numbered accordingly.

Please call me at (216) 429-6396 if you have any questions or require additional information regarding this matter.

Sincerely,

S. Rihtar

Environmental Engineer

Environmental Control Department

SR:db

Attachment

CERTIFIED - RETURN RECEIPT

cc & attm.: Mr. Murat Tukel - OEPA, Twinsburg

Mr. B. J. Meder - Cuy. Co. Bd. of Health

Ms. Joanne Hartman - Cleve. Dept. of Health

# LTV STEEL COMPANY, INC. INCIDENT I.D. NO. 9304-18-1379

## 1. Reporting

- a. 11:30 a.m. April 13, 1993
- b. 11:30 a.m. April 13, 1993
- c. 3:50 p.m. April 13, 1993 Reported to Nation Response Center.
- d. I.D. No. 9304-18-1379
- e. Ohio EPA notified by S. Rihtar, LTV Steel Co.

### 2. Location

- a. LTV Steel Company, Inc. 3100 East 45 Street Cleveland, Ohio 44127
- b. Cuyahoga County Village of Newburgh Hts.
- c. Lat: 41 27' 19", Long: 81 40' 17"
- d. NA

## 3. Product Release

- a. Tar-contaminated soil, EPA Waste No. K141
- b. No
- c. Approximately 96,000 Pounds

## 4. Environmental Impact

- a. No
- b. NA
- c. Approximately 5,000 square feet, surface contamination only.
- d. No
- e. No
- f. None
- q. NA

## Monitoring and Detection

- a. Visual
- b. NA
- c. NA, the release was not offsite.

## 6. Mitigation, Containment Action

- a. 96,000 Pounds
- b. The material was scraped up with a front-end loader and placed into dump trucks and rolloff containers.
- c. Envirosafe Services of Ohio, Inc. Landfill
- d. NA
- 7. Plans to Eliminate Future Spills
  An employee has been assigned the duty of observing the excavation of #1 sedimentation pond for the presence of tar. If tar is encountered, appropriate material management will ensue.

- 8. Health Risks
  - a. None
  - b. NA
- 9. <u>Permits</u>
  Approved Permit to Install No. 02-5830 for the Cleveland Works
  Landfill.
- 10. Chronological Review
  - April 13, 1993 11:30 a.m. Fill dirt for use at Pond #3 was observed to have tar contamination.
    - 11:35 a.m. Ceased excavation of Pond #1.
    - 11:35 a.m. Ceased construction at Pond #3.
    - 11:40 a.m. Enviroserve Services, Inc. was contacted for remediation and decontamination of equipment.
      - 2:45 p.m. Enviroserve arrived and initiated cleanup.
      - 3:50 p.m. National Response Center notified (Report #167283).
      - 3:55 p.m. Ohio EPA Emergency Response notified.
  - April 15, 1993 11:00 a.m. Remediation completed.
- 11. Manifests are attached.
- 12. Extenuating Circumstances
  Unknowingly, approximately 30 tons of tar contaminated soil was excavated during the construction of #1 sedimentation pond and placed into 2 dump trucks. The contaminated material was then dumped and spread at the #3 Pond construction site for the purposes of constructing an embankment. Immediately upon discovery of the tar contamination, operations ceased and remediation was initiated.
- 13. Economic Impact
  - a. NA
  - b. NA
  - c. \$75,600
  - d. NA

14. Environmental Contact
Stan Rihtar, Environmental Engineer - 216/429-6396
Richard Nemeth, Manager - 216/429-6370

This is your company's opportunity to explain in its own words, the circumstances and actions relating to the release of pollutants to the environment. If any of the following questions are not applicable to your incident, indicate NA for that item.

## l. Reporting

- (a) Time and date of discharge/release.
- (b) Time and date of discovery that the discharge had occurred.
- (c) When and to who was the release first reported?
- (d) Indicate the identification number referenced in the cover letter.
- (e) Who notified Ohio EPA/U.S. EPA?

## 2. Location

- (a) Mailing address.
- (b) Location of discharge; County, Township and City.
- (c) Longitude and latitude if source was non-transportation. (or enclose copy of a portion of a U.S. GS map showing location)
- (d) Distance and direction from nearest intersection (or milepoint) if transportation related.

## 3. Product Release

- (a) Please give the common and technical name(s) of the material(s) released and CAS Number(s).
- (b) Is the product listed under Section 302 (a) of SARA Title III or CERCLA 102(a). (If yes, then a copy of your response to these questions should be sent to your LEPC).
- (c) What was the quantity and duration of the discharge. Indicate volume in gallons or pounds.

## 4. Environmental Impact

- (a) Did the product reach "Waters of the State:?

  Provide the name of the water course. (Underground waters are waters of the State.)
- (b) What was the length or area of the water affected?
- (c) If no water was affected, what was the surface area and depth of soil contamination. Please provide area of soil contamination even when waters are affected.
- (d) Did any evacuation result?
- (e) Was any animal or vegetation damage observed?
- (f) Were any health effects reported? How many humans were exposed/injured?
- (g) Was medical advice provided for exposed individuals?

## 5. Monitoring and Detection

- (a) Describe how the release was detected and monitored to determine off-site concentration. (Be specific as to any monitoring system in place at your facility.)
- (b) If the release was airborne, how was the wind direction and speed determined?
- (c) Was the public warned and if so, how?

## 6. Mitigation, Containment Action

(a) How much product or waste was recovered or neutralized.

- (b) How was the material recovered or neutralized?
- (c) Where was the cleanup waste taken?
- (d) Were any other actions taken to reduce the impact of the discharge (boom, siphon dams, sorbent)?
- 7. Please provide plans to eliminate any future spills discharges or emissions which may occur at this specific source. This m include; employee training, replacement of equipment, construction, r security measures such as lighting, fencing or locks.

If this is the second oil spill at this location, or a sp_age of over 1,000 gallons which has reached water, then you must submit copies of your Spill Prevention Control and Countermeasure Plan (SPCC) to the USEPA Regional Administrator and to this Agency within 60 days from the time of the discharge as provided by 40 CFR 112.4. Your SPCC plan should be submitted with your response to this letter.

## 8. Health Risks

- (a) What protective precautions were taken as a result of the release?
- (b) List known or anticipated acute and chronic health risks of exposure to the substances which are released. Site source of information provided.
- 9. Indicate any air, water, or other permit numbers which may be pertinent to this incident. Please indicate type of permit(s).
  - (a) If this is an NPDES/air permit, please enclose a copy of your current effluent/emission limitations.
- 10. Provide a chronological review of the incident. Include a chronology of communications with state and local government agencies.
- 11. Provide any photographs, reports or other documents whether generated by your company or outside entities which are germane to the incident (e.g. accident reports, manifest, bills of lading laboratory analyses?)
- 12. Describe any extenuating circumstances which caused the discharge.
- 13. Economic Impact (This question is voluntary)
  - (a) What was the dollar value if any of the spilled product?
  - (b) What was the equipment damage cost?
  - (c) What were the costs of spill cleanup?
  - (d) What are the estimated costs of spill prevention to eliminate possible reoccurrence of this event?
- 14. Provide the name and title of the environmental contact(s) at your company and their telephone number.

# Submit your response within 30 days to:

Ohio EPA, Office of Emergency Response P.O. Box 1049, 1800 WaterMark Drive Columbus, Ohio 43266-0149

April 14, 1993

Mr. David Ridenour Envirosafe Services of Ohio, Inc. P.O. Box 167571 Oregon, Ohio 43616

Dear Mr. Ridenour:

Subject: **GSN 11637 012** 

LTV Steel Co., Inc. respectfully requests that the above referenced waste stream be amended to reflect a volume increase of approximately 1,000 cubic yards of material.

Your assistance in effecting this change is greatly appreciated.

Sincerely,

S. Rihtar

Environmental Engineer

Environmental Control Department

SR:db

ChicEPA
State of Ohio Environmental Protection Agency

Northeast District Office 2110 E. Aurora Road Twinsburg, Ohio 44087-1969 (216) 425-9171 FAX (216) 487-0769 DEGETVED June 1

ENVIRONMENTAL CONTROL DECT.

George V. Voinovich Governor

October 1, 1992

RE: LTV STEEL COMPANY, INC. OHD 004 218 673 CUYAHOGA COUNTY LOG

### CERTIFIED MAIL

Mr. R. L. Nemeth Superintendent Environmental Control LTV Steel Company 3100 East 45th Street Cleveland, Ohio 44127

Dear Mr. Nemeth:

This office has become aware that LTV-Steel Company recently encountered a layer of tar like material during excavation activities associated with the construction of Sedimentation Pond \$4 in the Yucca Flats area. During our phone conversation on September 17, 1992, you indicated that this material appeared to be tar sludges from coke batteries generated during the 1950's. The material tested hazardous for pyridine and benzene. LTV-Steel excavated the waste and visibly contaminated soils and placed the excavated materials into roll-off boxes. Approximately 400 cubic yards of contaminated soils are currently being stored at the site. Ohio EPA requires LTV-Steel to analyze and properly dispose of the contaminated soils. LTV-Steel has ceased all construction activities related to Sedimentation Pond \$4 and has covered the excavated area with a clay layer.

This pre-RCRA solid waste management unit will be investigated under RCRA Corrective Actions. This office recommends LTV-Steel excavate and properly dispose all the contaminated soils. LTV-Steel shall conduct investigations and remedial activities consistent with the U.S. EPA RCRA Corrective Action guidance. All the analytical results, disposal documentation and remediation plans shall be kept at the facility for future reference. Ohio EPA does not intend to provide oversight of the remediation activities, but does request documentation of proper disposal of excavated materials. LTV-Steel may send us a copy of its remediation plan although Ohio EPA does not intend to review or comment on this plan at this time.

Mr. R. L. Nemeth October 1, 1992 Page -2-

Please be advised that Ohio EPA reserves the right, pursuant to Chapters 6111 and 3734 of the Ohio Revised Code and any other applicable state and federal law or regulation, to require further site investigation and remediation to address releases into the environment of hazardous wastes, hazardous substances, industrial wastes, pollutants or contaminants at the facility.

If you should have any questions regarding this letter, please do not hesitate to call me at (216) 963-1192.

Sincerely,

Murat Tukel

Environmental Engineer

Division of Hazardous Waste

Management

MT/fwn

cc: Harry Courtright, DHWM, NEDO Scott Winkler, DSIWM, NEDO

Rod Beals, DERR, NEDO

B. J. Meder, Cuyahoga County Health Department



February 19, 1992

Mr. Joseph M. Boyle, Chief RCRA Enforcement Branch United States Environmental Protection Agency - Region 5 77 West Jackson Boulevard Chicago, Illinois 60604-3590



Re: Response to February 5, 1992 Second Notice of Violation EPA ID No: OHD 004 218 673

Dear Mr. Boyle:

LTV Steel Company, Inc. (LTV Steel) was issued the above referenced Notice of Violation (NOV) which continues dialog regarding an August 28, 1989 inspection of the Cleveland Works performed by representatives of the U.S. EPA. The current NOV indicates that the second of two identified and ongoing issues has been satisfied (LTV Steel response of April 15, 1991), but that the first issue remains outstanding. LTV Steel believes that the explanation contained herein, and that previously provided in our first response, satisfies the requirement of 40 CFR Part 266, and LTV Steel is in compliance with those applicable regulations.

The remaining issue deals with the rebuttable presumption of 40 CFR Part 266.40. LTV Steel is in compliance with the requirements of 40 CFR 266.44 -- Standards applicable to Burners of used oil burned for energy recovery. The point at issue appears to relate to the Marketer, as regulated under section 266.43. The technical and analytical chemistry issues originally raised were answered by our Marketer in a letter from Research Oil Company dated April 5, 1991, and enclosed with the original LTV Steel response to USEPA also dated April 5, 1991. If the Agency questions the sampling method employed by the Marketer, that issue should rightly be addressed directly with Research Oil. However, to help resolve this issue as quickly as possible, LTV Steel forwarded a copy of this Notice of Violation to Research Oil. Attached is a copy of Research Oil's response dated February 20, 1992. We hope that this further explanation is sufficient to resolve the matter.

Mr. Joseph M. Boyle, Chief February 19, 1992 Page 2

LTV Steel believes that all requirements of 40 CFR Part 266, Subparts D and E, applying to Burners of used oil fuel were being complied with at the time of the 1989 inspection, and continue to be complied with. LTV Steel is very concerned with a resolution of this matter, as Research Oil provides a very valuable and necessary service to us.

Please contact me should you wish to meet with LTV Steel or Research Oil to discuss this issue further.

Sincerely,

R. L. Nemeth

Manager

Environmental Control Department

Enclosures



February 20, 1992

Mr. Richard Nemeth Environmental Superintendent LTV Steel Company 3100 East 45th Street Cleveland, Ohio 44127

Dear Mr. Nemeth:

Thank you for providing us with a copy of the letter you received from Joseph M. Boyle, Chief, RCRA Enforcement Branch, USEPA, Region V.

I have reviewed Mr. Boyle's points concerning rebuttal of the presumption that used oil containing greater than 1,000 ppm of total halogens is a hazardous waste. As the supplier of the oil in question, we have reviewed the regulations in 40CFR 266.40. Neither the regulations nor the comments in the preamble that appeared in the Federal Register with the regulation specified any EPA method to be used in rebuttal. Although court proceedings in the five years since this regulation became effective have emphasized the need for analytic results in rebutting the presumption of mixing, no method has been specified to date. The regulations, as written, allow knowledge of the waste as a sufficient justification for this rebuttal. absence of a specific test method, our analytic work was developed to verify and validate the declarations of the generators of the used oil raw material used to produce the fuel product we sell to you. Research Oil has had numerous RCRA inspections by OEPA since 1985 and one by USEPA in 1987. During each inspection, we demonstrated our test methods for determining total and volatile halogens with only a single comment and no notice of violation. In 1987, we sent Shirlee Braur, USEFA Region V, data on the use of the microcoulometer in determining total halogens. She thought that only the bomb calorimeter was approved and was concerned about out testing each inbound load by this slow method. We also sent a copy of the test for SW846. However, we at Research Oil will henceforth only use the gas chromatograph (SW846 method 8010) as the analytic tool to rebut the presumption that a used oil containing greater than 1,000 ppm of total halogens is mixed with a hazardous waste. This rebuttal will only be made when there is no evidence on the GC scan of any halogenated solvent listed in F001 and F002 at a concentration of more than 100 ppm.

Before Research Oil adopted SW846 method 9029, as revised to detect both volatile and total halogens, we undertook substantial laboratory quality assurance of the method analysis. Two

Mr. Richard Nemeth Page 2 February 20, 1992

analytic projects were completed before we standardized procedures for testing each incoming load of used oil. First, over a two week period, 50 samples of incoming used oils which tested greater than 1,000 ppm total halogens by SW846 were distilled in our laboratory at various temperatures to determine a temperature sufficiently above the boiling point of each halogenated solvent listed in F001 and F002 to insure virtually complete removal. This project included spiked samples of varied mixtures of halogenated solvents, as well as actual samples received at our facility. This work demonstrated that substantially all listed halogenated solvents evaporated from mixtures with used oil at temperatures below 200°C. Based on the first project, Research Oil tested incoming samples with greater than 1,000 ppm of total halogens on both the microcoulometer and the gas chromatograph to determine that there was a high degree of conformance between the results on each unit for a wide variety of used oils.

In 1985 and 1986, when these tests were done, Research Oil received an average of 25 truckloads of used oil each day. After two months of testing, Robert Lohman, then Chief Chemist, and Doreen Ostroske, then Assistant Lab Manager, were convinced that the detection of both halogenated solvents and total halogens on the nicrocoulometer provided us with consistent results. This method was then adopted and the time consuming gas chromatograph scans were dropped.

After you informed us of the notice of violation from USEPA, we resumed parallel analysis by microcoulometer and gas chromatograph in order to reconfirm once again the efficiency and accuracy of the method we used.

We stand ready to provide further data or meet with you or the USEPA. Please inform us if we can help.

Sincerely yours,

RESEARCH OIL COMPANY

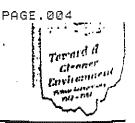
Alan Gressel President

AG:cm

FEB 20 92 11:13

are of Ohio Povisonmental Profestion Agency

O. Box 1049, 1800 WaterMark Dr. biumbus, Ohio 43266-0149



Richard F. Celeste Governor

December 4, 1987

Re: Reserach Oil Co. OHOOO4178612 Waste Oil Fuel Marketer Cuyahoga County

Mr. Alan Gresel Research Oil Co. 2055 Transport Road Cleveland ON 44115

Dear Mr. Gresel:

On September 18, 1987 Shirlee Braur of USEPA and Chris Coder and myself of Ohio EPA inspected your facility for compliance with USEPA's hazardous waste regulation (40 CFR parts 261 & 266) and Ohio's hazardous waste rules (OAC 3745-51\$58) as applicable. At that time you reported that you process used oil and aqueous hazardous waste in separate systems. You stated that you market off-spec used oil fuel and smaller quantities of hazardous waste to burners. You stated your waste fuel burning activities were confined to off-spec used oil fuel at the time of the inspection.

Your notification, waste sampling and other recordkeeping appeared to be in order. The results of the three samples taken by Ohio EPA will be supplied to you as they become available.

Thank you for your cooperation.

Sincerely,

Randy Walton

S&E Section, DSHWA

RW/drr

18725(38)

cc: RF

HRE-8J

## <u>CERTIFIED MAIL</u> RETURN RECEIPT REQUESTED

Mr. Richard Nemeth Environmental Superintendent LTV Steel Company 3100 East 45th Street Cleveland, Ohio 44127

> Re: Second Notice of Violation EPA ID No: OHD 004 218 673

Dear Mr. Nemeth:

On March 8, 1991, the United States Environmental Protection Agency (U.S. EPA) issued LTV Steel Company a Notice of Violation (NOV) which identified two violations of 40 CFR Part 266. On April 9, 1991, U.S. EPA received your response to that NOV. U.S. EPA has reviewed your response and determined that it is deficient.

The first violation concerned the rebuttable presumption of 40 CFR 266.40. During an August 28, 1989, inspection of LTV Steel Company by U.S. EPA, it was discovered that analyses of used oil to be burned by your facility contained greater than 1,000 ppm of total halogens. According to 40 CFR 266.40, such oil is presumed to be hazardous waste because it has been mixed with halogenated hazardous waste. In your April 9, 1991, response, you attempted to rebut this presumption by arguing that the volatile chlorine values were all less than 100 ppm and that, therefore, there was no significant levels of any single chlorinated organic solvent.

This rebuttal is inadequate for several reasons. First, according to your April 9, 1991, submittal, volatile chlorine values were determined using a microcoulemetric titration system that followed SW846 method 9029. We are not aware of this method; it is not in the current SW846, 3rd edition, or in its first update. Therefore, at this time we do not consider this an approved method. We request that you provide clarification on this point. Second, you argue that this method will detect all halogenated solvents on the F001/F002 list, given that they all have boiling points less than 200 °C. We disagree with the logic underlying your argument. While these solvents may have boiling points of less than 200 °C when tested in isolation, this is not necessarily the case when the solvents are part of a mixture. When the solvents are in mixture, their individual boiling points will change, and may no longer be less than 200 °C. Therefore, we cannot concur with your conclusion.

Regarding Item 2 of the NOV, we had requested evidence that your facility complied with 40 CFR 266.44(e), which requires that a burner of off-specification used oil fuel keep a copy of each certification notice required in 40 CFR 266.44(c), for three years from the date he last receives off-specification used oil fuel from a marketer. A copy of the required notice was provided as part of your April 9, 1991, response. Thus we consider this item of the NOV to have been satisfied.

You are required to submit a response in writing to this office no later than 15 days after receipt of this letter documenting the action taken to comply with the above requirements. Failure to comply within the specified time may result in additional Federal enforcement actions.

If you have questions and/or concerns regarding this matter, please contact Jennifer Wolf of my staff at (312) 886-4447.

Sincerely yours,

ORIGINAL SIGNED BY JOSEPH M. BOYLE

Joseph M. Boyle, Chief RCRA Enforcement Branch

cc: Mike Savage, OEPA

CONCURR	RENCE REC	QUESTED F	ROM REB
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5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Richard Nemeth Environmental Superintendent LTV Steel Company 3100 East 45th Street Cleveland, Ohio 44127

Re: Notice of Violation

EPA ID No: OHD 004 218 673

Dear Mr. Nemeth:

On August 28, 1989, your facility located in Cleveland, Ohio was inspected by United States Environmental Protection Agency (U.S. EPA) representatives. The purpose of the inspection was to evaluate compliance with the requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations codified at 40 CFR Part 266, Subparts D and E.

Based on information provided by facility personnel, records review and visual inspection of the site at the time of investigation, it was determined that the facility accepts used oil to be burned for energy recovery. It was also determined that the facility is in violation of the following requirements:

- 1. 40 CFR 266.40, which states that used oil containing more than 1,000 ppm of total halogens is presumed to be hazardous waste because it has been mixed with halogenated hazardous waste. People may rebut this presumption by demonstrating that the used oil does not contain hazardous waste listed in Subpart D of Part 261. Unless you can successfully rebut this presumption, however, the fuel should be managed as a hazardous waste fuel in accordance with the requirements of 40 CFR 266.35. During an inspection at LTV Steel Company on August 28, 1989, analyses of used oil to be burned by LTV Steel Company contained 2,143 ppm, 2,690 ppm, 2,408 ppm and 4,483 ppm of total chlorine. Only the March 1989, sample analysis (2,408 ppm) contained documentation in the form of a solvent scan to rebut the presumption.
- 2. 40 CFR 266.44(e), which requires a burner of off-specification used oil fuel to keep a copy of each certification notice required in 40 CFR 266.44(c), for three years from the date he last receives off-specification used oil fuel from a marketer. At the time of the inspection copies of the required notice were not available for review at the facility.

You are required to submit a response in writing to this office no later than 30 days after receipt of this letter documenting the actions taken to comply with the above requirements. The documentation provided should be for the period of time from the date of the inspection to the date of this letter. Failure to reply within the specified time may result in additional Federal enforcement actions.

If you have questions and/or concerns regarding this matter, please contact Allen Wojtas of my staff at (312) 886-6194.

Sincerely yours,

Laura L. Lodisio, Acting Chief RCRA Enforcement Branch

cc: Mike Savage, OEPA

bcc: A. Budich, REB

AWOJTAS:slowery:09/19/90:3.5 disk #2 :Filename:NEMETH.LTR (5.1)rev.2/26/91slm FINAL:3/1/91SLM

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MEGET BOILE

United States Environmental Protection Agency - Region V 230 South Dearborn St. Chicago, Illinois 60604

Attn: Ms. Laura L. Lodisio, Acting Chief

RCRA Enforcement Branch

Re: LTV Steel Company

Cleveland Works - East & West

EPA ID Nos: OHD 004 218 673 & OHD 046 203 774

Notice of Violation

Dear Ms. Lodisio:

An inspection of the LTV Steel Company, Inc. at the above referenced location was performed by representatives of the U.S. EPA on August 28, 1989. LTV Steel notes that the March 8, 1991 Notice of Violation received is erroneous and the facility is in compliance for the following reasons:

Item 1 of the Notice of Violation questions the rebuttable presumption of 40 CFR 266.40. Four composite fuel analyses are referenced in the NOV for used oil fuels containing in excess of 1000 ppm total chlorine. This information was provided to the agency during the 1989 inspection. Also provided to the agency, on the same Composite Outgoing Fuel Analyses (attached), are the corresponding volatile chlorine values. Three of the four volatile chlorine values are shown to be not detectable and the fourth showed only 75 ppm. The failure of any of the volatile chlorine analyses to show a value greater than 100 ppm conclusively rebuts the presumption that any single chlorinated organic solvent was mixed with the used oil. Research Oil Company, the used oil marketer who provided LTV Steel with the used oil in question, has provided a technical description of the volatile chlorine analytical procedure, which is attached for your analysis. Research Oil's description of the volatile chlorine analytical method explains why a volatile chlorine concentration of less than 100 ppm conclusively rebuts the presumption as outlined by 40 CFR 266.40.

Item 2 of the Notice of Violation questions the one time certification notice requirement of 40 CFR 266.44(c), and with the 266.44(e) invoice recordkeeping requirement. A copy of the appropriate certification notice sent to Research Oil on March 26, 1986 is attached. Also attached is a representative invoice. These invoices are micro-filmed and maintained on file in the LTV Steel purchasing department for a period in excess of three years. Bills of lading are also maintained for each load at the plant Utilities Department for a period in excess of three years. This

Ms. Laura L. Lodisio April 5, 1991 Page 2

separation of responsibilities may have resulted in some confusion during the USEPA's 1989 inspection. However, LTV Steel's maintenance of all such records complies with the applicable portion of 40 CFR 266.40.

Based on the foregoing, all requirements of 40 CFR Part 266, Subparts D and E were being complied with at the time of the inspection by USEPA. Please contact me at 216/429-6370 if you have any further questions.

Sincerely,

R. L. Nemeth

Manager

Environmental Control Department

Enclosures

cc: Ohio EPA - NEDO, Twinsburg, OH

Attn: Mr. Gregory Taylor

# COMPOSITE OUTGOING FUEL ANALYSES . FOR OFF-SPEC OIL LTV Steel

## September 1988

## F.P. = 175°F Cl_v = ND Cl_t = 0.2143%

## March 1989

# December 1988

# July 1989

•		
F.P.	-	205°F
CI	•	.0075%
Cl	=	.4483Xv
Г.		



Cl, = % Volatile Chlorine

Cl; = % Total Chlorine





April 5, 1991

Mr. Richard Nemeth Environmental Superintendent LTV Steel Company 3100 East 45th Street Cleveland, Ohio 44127

Dear Mr. Nemeth:

You have asked Research Oil to provide you with the documentation necessary to rebut the presumption that fuel oil supplied to LTV with in excess of 1,000 ppm of halogens is a hazardous waste.

You provided us with composite analyses of the fuel oil shipped from our facility to LTV during September and December, 1988, and March, 1989, of which we have enclosed a copy for reference. Research Oil analyzes the fuel oil it recycles using the microcoulometer according to the procedure enclosed with this letter. We report the results obtained at 200°C-250°C with a helium atmosphere as volatile chlorine and the sum of the chlorine reported above and the chlorine obtained at 1050°C as total chlorine. This procedure was adopted because its ease and speed allows us to test, if we wish, every load of incoming used oil and outgoing fuel oil. Before this procedure was adopted, we compared the results of gas chromatograph analysis of chlorinated solvents in used oils and fuel oils recycled from used oils with the microcoulometer results reported as percent volatile chlorine.

In every case, the oils giving results of 200 ppm volatile chlorine or less on the microcoulometer fail to show any chlorinated solvent at 100 ppm or more on the gas chromatograph. Since we store finished oil samples for only 12 months after shipment, Research Oil does not have retained samples for the period September, 1988 to July, 1989. We did, however, run a new series of tests in the past week comparing current samples of fuel oil with total chlorines in the range of 2,000 to 4,5000 ppm total chlorine and non-detectable and less than 100 ppm volatile chlorine on the microcoulometer with GC scans of the same samples. The samples tested confirmed the correlation between the microcoulometer and the gas chromatograph.

Mr. Richard Nemeth Page 2 April 5, 1991

We are confident that USEPA will accept the submission of the test protocol enclosed with this letter as a successful rebuttal of the presumption that the fuel oil we shipped to LTV is a hazardous waste because of contamination with spent solvents.

If you have any further questions, please contact Ms. Dietrich West, Lab Manager, or the writer.

Sincerely yours,

RESEARCH OIL COMPANY

Alan Gressel President

AG: cm

Enclosure

### ORGANIC HALIDE ANALYSIS

Organic halogenated compounds are analyzed using a Rosemount Dohrmann microcoulometer (Model MCTS-20 and/or DX-20B). This is a microcoulometic titration system that follows SW846 method 9029.

The samples are first prepared for injection by extraction with toluene. This ensures that no inorganic chloride is detected.

Volatile halogenated compounds can be differentiated from non-volatile halogenated compounds by placement of the boat in the pyrolysis furnace at 200°C - 250°C under a helium rich atmosphere. The halogenated solvents on the F001/F002 list have boiling points <200°C. Therefore, the ions that are titrated from this position are volatile.

Once the volatile has been removed, the boat is moved into the furnace at 1050°C under an oxygen rich atmosphere. This will remove the non-volatile halogenated compounds that have higher boiling points. For instance, chlorinated paraffin (boiling point, 360°C - 400°C) or PCB (boiling point, >800°C).

This can be confirmed by placing a monochlorobenzene standard prepared in iso-octane at the volatile position. Our results prove greater than 90% recovery. A standard of chlorinated paraffin can also be placed in this position to prove that no chlorine will be detected at the lower temperature and greater than 90% recovery is achieved when the sample is placed in the non-volatile position at a higher temperature.

# COMPOSITE OUTGOING FUEL ANALYSES . FOR OFF-SPEC OIL LTV Steel

## September 1988

## F.P. = 175*F Cl = ND Cl = 0.2143%

## December 1988

		200°F	
CI.	<b>≈</b> 1/	D	
CI CI	<b>-</b> C	.2690%	1

## March 1989

F.P.	, =	= 206°F
C1.	=	ND
C1 v	₽	0.2408%

# July 1989

F.P.	<b>-</b>	205°F .0075%
CI	=	.0073% .4483% 🗸
V - Ł	_	• ************************************



 $CL_{\sigma} = \%$  Volatile Chlorine

Cl = % Total Chlorine



Research Oll Company

	CHLORINATED SOLVENT	BOILING POINT (°C)
F001,2	Tetrachloroethylene	121°C
F001,2	Trichloroethylene	86.7°C
F001,2	Methylene Chloride	40.1°C
F001,2	1,1,1-trichloroethane	75°C
F001	Carbon Tetrachloride	76.74°C
F002	Chlorobenzene	131.6°C
F002	1,1,2-Trichloro-1,2,2-trifluoroetham	ne 47.6°C
F002	0-Dichlorobenzene	172°C-179°C
F002	Trichlorofluoromethane	23.7°C
F002	1,1,2-Trichloroethane	113.7°C

From Handbook of Toxic and Hazardous Chemicals and Carcinogens

Non-Volatile Chlorine (like chlorinated paraffin has boiling points between 360°C-400°C)

PCB's have boiling points >800°C

Sue-What do I do about fluorocarbons?

# COMPOSITE OUTGOING FUEL ANALYSES . FOR OFF-SPEC OIL LTV Steel

<u>Se</u>	pt	em	<u>s d</u>	I	19	88
_	_		_			_

F.P. = 175°F Cl = ND Cl = 0.2143%

Pb = 108 ppm Cd = 0.9 ppm Cr = 11 ppm As = <1 ppm

# December 1988

F.P. ~ 200°F Cl = ND Cl_t = 0.2690% >

Pb = 151 ppm }
Cd = 0.8 ppm
Cr = 10 ppm
As = <1 ppm

# March 1989

F.P. = 206°F C1 = ND C1 = 0.2408%

Pb = 96 ppm Cd = 0.9 ppm Cr = 12 ppm v As = <1 ppm

# July 1989

F.P. = 205°F C1 = .0075% C1 = .4483%

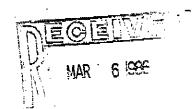
Pb = 84 ppm Cd = 1.1 ppm Cr = 17 ppm As = <1 ppm



 $Cl_v = % Volatile Chlorine$ 

Clt = % Total Chlorine





March 24, 1986

Mr. Robert A. Vilcheck Research Oil Company 2655 Transport Road Cleveland, Ohio 44115

Dear Mr. Vilcheck:

As a part of LTV Steel Company, Inc.'s responsibility under the EPA's new "Burning and Blending" rules, burners must provide marketers with one-time certification that appropriate notice regarding use of used oil and hazardous waste fuels was provided EPA.

The attached copies of notices mailed to the U.S. EPA are provided to meet that requirement and intended as certification that LTV has filed appropriate notice as required.

Please contact Mr. R. P. Muhlhan at (216) 622-4824 should you have any questions regarding this notice.

Sincerely yours,

R. P. Muhlhan

Supervising Buyer

Industrial Gases and Fuel

pjk 1.52

Attachments

LTV Steel Company

bee: J. L. Bush
H. R. Clagg
L. E. Larson
R. P. Huhlhau
R. L. Nemeth

January 27, 1985

J. V. Stack M. A. Suhoza W. L. West W. G. Wiley

# Certified Mail-Return Receipt Requested

R. C. Windahl T. A. Zalenski

U.S. EPA Region V Post Office Box A3587 Chicago, Illinois 60604

Ohio EPA Post Office Box 1049 Columbus, Ohio 43216-1049

Attn: RCRA Activities

Attn: Division of Solid and Hazardous
Waste Management

Re: LTV Steel Company, Inc. Cleveland (East) Works EPA I.D. No. CHD 004218673

#### Gentlemen:

Pursuant to the requirements of 50 FR 49164 (November 29, 1985), LTV Steel Company, Inc. is hereby filing a subsequent notification of its burning activities under section 3010 of RCRA.

At the above referenced facility, LTV Steel Company, Inc. presently burns hazardous waste fuel (Cadence Product 312) in blast furnace(s) which are "industrial furnace(s)" under the definitions in 40 CFR 260.10. In addition, this facility also burns both specification and off-specification used oil fuels in steel plant combustion facilities which are "industrial boilers" and/or "industrial furnaces" as defined in 40 CFR Part 260.10.

LTV Steel Company, Inc. does not intend to store hazardous waste fuel (Cadence Product 312) prior to burning. Thus, this notification is for the burning of hazardous waste fuel and not a notice, prerequisite for interim status, for storage.

Should you have any questions, please contact Mr. L. A. Szuhay at 216-429-6475.

Very truly yours,

J. M. Farley Vice President Engineering

JMF/fb

1554a

LTV STEEL COMPANY + CORPORATE ENVIRONMENTAL CONTROL DEPARTMENT 4 3100 EAST 45TH STREET + CLEVELAND OHIO 44127 + TELEPHONE (216) 822-647;

## Certification Statement

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

J. M. Ranley)
Vice President Engineering
LTV STEEL Co., Inc.

D=+a

400.32A9

LTV Steel Company

bee: J. L. Bush H. R. Clags

L. E. Larson R. P. Muhlhan R. L. Nemeth

R. L. Nemeth J. V. Stack

M. A. Suhoza V. L. Vest

W. C. West W. G. Wiley

January 27, 1986

R. C. Windahl
T. A. Zalenski

Certified Mail-Return Receipt Requested

U.S. EPA Region V Post Office Box A3587 Chicago, Illinois 60604

Ohio EPA
Post Office Box 1049
Columbus, Ohio 43216-1049

Attn: RCRA Activities

Attn: Division of Solid and Hazardous Waste Management

Re: LTV Steel Company, Inc. Cleveland (West) Works EPA I.D. No. OHD 046203774

#### Gentlemen:

Pursuant to the requirements of 50 FR 49164 (November 29, 1985), LTV Steel Company, Inc. is hereby filing a subsequent notification of its burning activities under section 3010 of RCRA.

At the above referenced facility, LTV Steel Company, Inc. presently burns hazardous waste fuel (Cadence Product 312) in blast furnace(s) which are "industrial furnace(s)" under the definitions in 40 CFR 260.10. In addition, this facility also burns both specification and off-specification used oil fuels in steel plant combustion facilities which are "industrial boilers" and/or "industrial furnaces" as defined in 40 CFR Part 260.10.

LTV Steel Company, Inc. does not intend to store hazardous waste fuel (Cadence Product 312) prior to burning. Thus, this notification is for the burning of hazardous waste fuel and not a notice, prerequisite for interim status, for storage.

Should you have any questions, please contact Mr. L. A. Szuhay at 216-429-6475.

Very truly yours,

e Resident Engineering

JMF/fh

1555a

LTV STEEL COMPANY . CORPORATE ENVIRONMENTAL CUNTROL DEPARTMENT . 3100 EAST 45TM STREET . CLEVELAND OHIO 44127 - TELEPHONE (216) 622-6471

### Certification Statement

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

H. Farle

Vice President Engineering

LTV STEEL Co., Inc.

JAN 65, 1981

Note:



# ¬-search Oil Company

2/// Braadway • Cleveland, Ohio 44115 Telephone: (216) 623-8383 • Fax: (216) 623-8393

Fuel Oil • Oil Recycling • Liquid Waste Disposal EPA 1.D. No. OHD 004178612

GENCED N. ST. HWODES
ATTN: ACCTS PAYABLE LOUIS VERIFICIANTEST.
LTV STEEL CO PO BOX 94671 CLEVELAND - OH

PLEASE REFER TO THIS NO. WHEN MAKING PAYMENT OR INQUIRY

INVOICE DATE
PAGE INVOICE NUMBER

INVOICE DATE

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State of Chio Environmental Protection Agency

Normeast District Office

Aurora Road
Tw. urg, Ohio 44087-1969

(21° 53-1200 (216) 425-9171 FAX (216) 487-0769 HER HER

George V. Voinovich Governor

February 20, 1991

CERTIFIED MAIL

RE: LTV STEEL CO.

CLEVELAND EAST FACILITY

CUYAHOGA COUNTY OHD #004 218 673 #02-18-0186

G/TSD

RECEIVED OHIO EPA

Mr. R.L. Nemeth Superintendent Environmental Control LTV Steel Company 3100 East 45th Street Cleveland, Ohio 44127

FEB 21 1991

DIV. of SOLID & HAZ. WASTE MGT.

Dear Mr. Nemeth:

The purpose of this letter is to summarize the results of my recent RCRA inspection of your facility which occurred on January 31 and February 1, 1991. This inspection was conducted in order to determine your facility's compliance with state hazardous waste rules and regulations. LTV Steel was represented by yourself, Stan Rihtar, Tom Girdler, Ron Knapik and Tom Harlan. The Ohio EPA was represented by Marlene Emanuelson, Linda Lagunzad and myself.

This facility is presently producing the following waste streams all of which are being stored on site for less than 90 days:

D008 BOF Dust

K062 Spent Pickel Liquor

F001 Degreasing Solvent - Tetrachlorethylene

D001, D018, D039 Degreasing Solvent

At the present time the 60" electroplate line storage tanks and the electric repair shop degreaser sludge container are undergoing closure. The 84" pickle line tanks have recently received closure certification.

The following violations were noted during the inspection:

1. rule 3745-65-13(B)(2) & (6) of the OAC, because LTV Steel failed to indicate in the waste analysis plan the correct test method for characterization of its waste in order to comply with 3745-59-09 of the OAC dealing with land disposal prohibitions and restrictions.

The test method indicated in the waste analysis plan was the EP-toxicity test, this should be replaced with the TCLP test.

Mr. R.L. Nemeth February 20, 1991 Page -3-

For the listed waste requirements:

- the CFR section(s) and the paragraphs where the treatment standards appear;
- the treatability group(s) of the waste.

For the characteristic waste requirements:

1. the subcategory of the waste;

2. the applicable five-letter treatment code found in Table 1 of 40 CFR 268.42.

Please address each of the above violations and submit related written or photographic documentation within 30 days of receipt of this letter.

A copy of this inspection report is being forwarded directly to U.S. EPA - Region V for appropriate follow-up.

If you have any questions concerning the requests or violations cited in this letter, please feel free to contact me at 425-9171.

Sincerely,

Environmental Scientist

Division of Solid and Hazardous Waste

Management

GT/fn

cc: Laurie Stevenson, DSHWM, CO Paul Anderson, DSHWM, NEDO

HRE-8J

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Richard Nemeth Environmental Superintendent LTV Steel Company 3100 East 45th Street Cleveland, Ohio 44127

> Re: Second Notice of Violation EPA ID No: OHD 004 218 673

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On March 8, 1991, the United States Environmental Protection Agency (U.S. EPA) issued LTV Steel Company a Notice of Violation (NOV) which identified two violations of 40 CFR Part 266. On April 9, 1991, U.S. EPA received your response to that NOV. U.S. EPA has reviewed your response and determined that it is deficient.

The first violation concerned the rebuttable presumption of 40 CFR 266.40. During an August 28, 1989, inspection of LTV Steel Company by U.S. EPA, it was discovered that analyses of used oil to be burned by your facility contained greater than 1,000 ppm of total halogens. According to 40 CFR 266.40, such oil is presumed to be hazardous waste because it has been mixed with halogenated hazardous waste. In your April 9, 1991, response, you attempted to rebut this presumption by arguing that the volatile chlorine values were all less than 100 ppm and that, therefore, there was no significant levels of any single chlorinated organic solvent.

This rebuttal is inadequate for several reasons. First, according to your April 9, 1991, submittal, volatile chlorine values were determined using a microcoulemetric titration system that followed SW846 method 9029. We are not aware of this method; it is not in the current SW846, 3rd edition, or in its first update. Therefore, at this time we do not consider this an approved method. We request that you provide clarification on this point. Second, you argue that this method will detect all halogenated solvents on the F001/F002 list, given that they all have boiling points less than 200 °C. We disagree with the logic underlying your argument. While these solvents may have boiling points of less than 200 °C when tested in isolation, this is not necessarily the case when the solvents are part of a mixture. When the solvents are in mixture, their individual boiling points will change, and may no longer be less than 200 °C. Therefore, we cannot concur with your conclusion.

Regarding Item 2 of the NOV, we had requested evidence that your facility complied with 40 CFR 266.44(e), which requires that a burner of off-specification used oil fuel keep a copy of each certification notice required in 40 CFR 266.44(c), for three years from the date he last receives off-specification used oil fuel from a marketer. A copy of the required notice was provided as part of your April 9, 1991, response. Thus we consider this item of the NOV to have been satisfied.

You are required to submit a response in writing to this office no later than 15 days after receipt of this letter documenting the action taken to comply with the above requirements. Failure to comply within the specified time may result in additional Federal enforcement actions.

If you have questions and/or concerns regarding this matter, please contact Jennifer Wolf of my staff at (312) 886-4447.

Sincerely yours,

ORIGINAL SIGNED BY JOSEPH M. BOXLE

Joseph M. Boyle, Chief RCRA Enforcement Branch

cc: Mike Savage, OEPA

AUTHOR'S FILE COPY

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State of Ohio Environmental Protection Agency

vrtheast District Office 10 E. Aurora Road Twinsburg, Ohio 44087-1969 (216) 425-9171 extra cen



Richard F. Celeste Governor

January 19, 1989

RE: LTV STEEL COMPANY

CLEVELAND WEST FACILITY

CUYAHOGA COUNTY OHD #046-203-774 #02-18-09-0391

G-TSDF

R. L. Nemeth
Superintendent Environmental Control
LTV Steel Company
3100 East 45th Street
Cleveland, Ohio 44127

Dear Mr. Nemeth:

Thank you for your submission of June 17 and August 30, 1988. The documentation which we received shows that the violations found during the inspection on April 28, 1988, have been corrected.

If you have any questions feel free to call me at 425-9171.

Sincerely,

Greg Taylor

Environmental Scientist Division of Solid and Hazardous Waste

Management

GT/sp

cc: Dave Sholtis, DSHWM, Central Office

Debby Berg, DSHWM, NEDO

CMC

5HR-12

## AUS 17 1988

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. R.L. Nemeth Superintendent Environmental Control LTV Steel Cleveland East 3100 East 45th Street Cleveland, Ohio 44127

Re: LTV Steel Cleveland East OHD 004 218 678

Dear Mr. Nemeth:

On April 28, 1988, the Ohio Environmental Protection Agency conducted a hazardous waste compliance inspection at your facility. Part of that inspection included a Land Ban Restriction Inspection.

This letter serves to inform you that the United States Environmental Protection Agency finds you to be in compliance with all applicable Land Ban Restriction Regulations of 40 CFR Part 268. Should you have any questions concerning the above, please contact Catherine McCord at (312) 886-4446.

Sincerely yours,

Sally K. Swanson, Acting Chief RCRA Enforcement Branch

cc: Michael Savage, OEPA-CO Greg Taylor, OEPA-NEDO

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# RCRA CONCURRENCE SHEET

SUBJECT: _	Letter of Compliance - LTV Steel Cleveland East										
	Mr. R.L. Nemeth										
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#### of Ohio Environmental Protection Agency

theast District Office JE. Aurora Road

Twinsburg, Ohio 44087-1969 (216) 425-9171

CF = US-15/16



Richard F. Celeste Governor

May 16, 1988

DIV STEEL RAST CUYAHOGA COUNTY OHD 004-218-673

#02-18-0186

CERTIFIED MAIL

JUL 13 1988

OFFICE OF RCRA

LTV Steel Company 3100 East 45th Street Cleveland, Ohio 44127

Attn: R. L. Nemeth

Waste Management Division U.S. EPA, REGION V Superintendent Environmental Control

Dear Mr. Nemeth:

On April 28, 1988, Kris Coder, Teresa Sabol and myself conducted a hazardous waste inspection of the LTV Steel Company, Cleveland East Facility, located at 3100 East 45th Street, Cleveland. You, Tom Harlan, Stan Rihtar and Dave Habeger represented the facility during the inspection. The facility was inspected for compliance with both Ohio and Federal Hazardous Waste Regulations.

During the inspection the following violations were noted:

- The facility must see to it that the personnel in the #2 BOF area receive 1. training in hazardous waste management procedures and that this training is documented as required by 40 CFR 265.16 and OAC 3745-65-16.
- The facility must provide documentation of the hazardous waste training of 2. upper management and supervisory personnel as required by 40 CFR 265.16 and 3745-65-16.
- The facility must document inspections of the #2 BOF area and it must 3. conduct remediation of the #2 BOF area as required by 40 CFR 265.15 and OAC 3745-65-15.

Please address the above violations and submit related documentation to demonstrate that your facility has returned to compliance within 30 days of receipt of this letter.

Please not that your facility's compliance with applicable closure and financial responsibility rules was not undertaken as a part of this inspection. Comments on these matter may be forthcoming at a later date.

Northeast District Office 2110 E. Aurora Road T burg, Ohio 44087-1969 (425-9171 Richard F. Celeste Governor

Copy from the ADD COMED-9

June 4, 1987

RE: LTV STEEL CO CLEVELAND EAST FACILITY CUYAHOGA COUNTY OHD 004-218-673 #02-18-0186 G-T-TSDF

LTV Steel Company 3100 East 45th Street Cleveland, Ohio 44127

Attn: R. L. Nemeth,

Superintendent Environmental Control

Dear Mr. Nemeth:

On May 28, 1987, I conducted a hazardous waste inspection of the LTV Steel Company, Cleveland East Facility, located at 3100 East 45th Street, Cleveland. You, Tom Girdler, Stan Rihtar, Tom Harlan and Dave Habeger represented the facility during the inspection. The facility was inspected for compliance with both Ohio and Federal Hazardous Waste Regulations.

During the inspection the following violations were noted:

- 1. The facility must begin to use the most current, up-to-date Uniform Hazardous Waste Manifest as required and published in the Federal Register/Volume 51, No. 190, Wednesday, October 1, 1986, Title 40 CFR Part 262 (Amended).
- 2. The facility must amend the waste analysis plan to include the test method(s) according to SW-846 for all hazardous waste streams generated by the facility as required by 40 CFR 265.13(b) and OAC 3745-65-13.

Please within 30 days of receipt of this letter, document to my attention corrections to the above referenced violations.

Please note that the Lan Ban Restriction Generator Checklist, completed as part of this inspection, is being forwarded to the U.S. EPA, Region V for appropriate follow-up.

Yours truly,

Kmis L. Coder

Environmental Scientist

Division of Solid and Hazardous Waste

Management

KLC/sp

Enclosure

cc: Mike Savage, DSHWM, Central Office

-> Compliance



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

# 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

2 9 007 1986

# MEMORANDUM

SUBJECT: LTV Corporation Bankruptcy

FROM: Jane M. Lupton June M. Lupton

Assistant Regional Counsel

TO: John Wheeler (LE-134S)

Office of Enforcement and Compliance Monitoring

During our October 16, 1986 conference call, I informed you and Anne Allen that Region V was compiling information regarding LTV Corporation's (and its subsidiaries') compliance with RCRA. Anne had specifically requested information about compliance with RCRA's financial requirements for Region V treatment, storage and disposal (TSD) facilities affected by the bankruptcy.

There are four LTV TSD facilities in Region V that are not in compliance. The Republic Steel Corporation facility located in Gary, Indiana (IND005444005) does not have liability insurance coverage for either sudden or nonsudden accidental occurrences and has not established financial assurance for closure. Three facilities in Ohio (Republic Steel, Mahoning Valley (OHD060409521) in Warren, LTV Steel (OHD004228003) in Canton, and Republic Steel Corp. (OHD004218673) in Cleveland) had liability insurance coverage that expired in March 1986. The Ohio Environmental Protection Agency has not been notified that coverage was extended after that time. These three facilities have a "performance bond" in place to satisfy RCRA's closure/post-closure financial assurance requirements. They have not yet performed the required annual adjustment for 1986, which was due earlier this year.

I will notify you once I receive further information about these facilities. Please call me at FTS 886-6830 if you have any questions.

cc: William Muno



September 2, 1986

## CERTIFIED MAIL

U.S. Environmental Protection Agency Region V 230 South Dearborn Chicago, IL 60604

Attention: Regional Administrator

Re: LTV Steel Company, Inc.

Cleveland Works East

OHD 004 218 673

Dear Sir/Madam:

Please be advised that on July 17, 1986, The LTV Corporation and numerous of its subsidiaries, including LTV Steel Company, Inc., filed petitions for reorganization under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of New York. The Chapter 11 proceedings have been assigned case numbers 86 B 11270 through 86 B 11334 inclusive and have been referred to the Honorable Burton R. Lifland, United States Bankruptcy Judge.

This notification is being made pursuant to 40 CFR §264.18 and/or §265.148 and/or analogous State requirements. LTV Steel Company's withdrawal of the Part A application for this facility is pending and the bond has not yet been returned.

Sincerely,

L. A. Szuhay

Manager-Solid and Hazardous Waste

Cars 8 .

Environmental Control

LAS/fh

cc: Ohio EPA

2269a

PART	I.	FACILITY NAME Republic Steel Cleveland District
		FACILITY LOCATION Cleveland, Ohio
	4	RCRA ID NUMBER OHD 004218673
		NATURE OF VIOLATION Late Notification
PART	II.	RECOMMENDATION
		NAME & DATE OF STATE CONTACT NOTIFIED
		ANY OTHER OUTSTANDING ENFORCEMENT ACTIONS AGAINST THIS FACILITY:
	*	WATER
		AIR
		OTHER
PART	III.	CONCURRENCES - INITIALS DATE AGREE, DISAGREE
*		PREPARER TECHNICAL  LEGAL  INITIALS  (6/21)  (1)  (1)
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		DIRECTOR, WASTE MANAGEMENT DIVISION APPROVES ( )
2	cc	: Section Inspection Log ORC



# State Of Ohio Environmental Protection Agency

). Box 1049, 361 East Broad St., Columbus, Ohio 43216-1049 to14) 466-8565



Richard F. Celeste, Governor

September 9, 1986

L.A. Szuhay LTV Steel Company Corporate Environmental Control Dept. 3100 E. 45th Street Cleveland, Ohio 44127 OND ON 218
TOREGED WASIE SHANCH

U.S. EPA. REGION V

Dear Mr. Szuhay:

Ohio EPA has completed review of documents from LTV Steel concerning recycling of Tar Decanter Sludge (K087) by the proposed AKJ process at the Warren Works. According to information provided by LTV Steel, this system involves: (1) emptying of dumpster containers of K087 and transfer to the AKJ process area; (2) addition of a diluent and steam; and (3) reintroduction of the combined material to the Tar Decanter. LTV described the AKJ process in a letter of May 5, 1986, and in two subsequent letters in response to Ohio EPA requests. LTV requested review by Ohio EPA in regard to two points: (1) compliance with hazardous waste recycling rules and regulations recently effective in Ohio; and (2) compliance with the spirit and letter of RCRA and USEPA's waste minimization regulations.

Regarding the first compliance issue, Ohio EPA specifically asked LTV to discuss compliance with recycling regulations in 40 CFR 261.2(e)(1)(iii) and OAC 3745-51-02(E)(1)(c) and also the discussion of "Distinguishing Sham Situations" found on page 638 of the January 4, 1985, Federal Register. Ohio EPA has considered this discussion to be appropriate for determinations of non-regulated activity and legitimate recycling. LTV provided responses through letters to me dated June 16 and July 14.

Based on the statements provided to Ohio EPA, we conclude that the recycling activity proposed by LTV Steel would be in compliance with OAC 3745-51-02(E)(1)(c). We also conclude that the recycled material would not be considered a waste while in this recycling system, provided that the conditions of "Distinguishing Sham Situations" of the January 4, 1985, Federal Register continue to be met. Also, LTV must comply with 40 CFR 261.1(b)(8) and OAC 3745-51(B)(8) concerning speculative accumulation. At the present time it appears that speculative accumulation by LTV is unlikely, since return of the tar decanter sludge through the AKJ process is proposed to occur on a daily basis.

# Republicateel

Republic Steel Corporation Cleveland District 3100 East 45th Street Cleveland OH 44127

July 20, 1983

# 040004218673 GTTSD PA

U.S. Environmental Protection Agency Region V RCRA Activities P.O. Box 7861 Chicago, Illinois 60680

Dear Sir or Madam:

Subject: SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

REVISIONS

Enclosed, please find revisions to the Republic Steel Corporation, Cleveland District's S.P.C.C. Plan involving the following section:

Spill Alert Plan - Pages 28, 29, 30 and 31

Please substitute these pages in your copy of the S.P.C.C. Plan book.

Should you require any additional information, please contact the undersigned at (216) 622-6371.

Sincerely,

S. Rihtar

Regulations Supervisor

Environmental Control Department

SR:db

Enclosures

cc: File 0.55.0-165.00





#### SPILL ALERT PLAN

### General

All personnel will be instructed on the problems and penalties that exist when a harmful substance is released to the environment (which includes air, water or soil) or a publicly owned sewage treatment plant or oil to a storm sewer, river, or sanitary sewer going to a publicly owned sewage treatment plant.

Specific training instructions will be developed for supervisors responsible for the proper procedure for spill notification and cleanup to ensure prompt and correct action. The Environmental Control Department will be responsible for ordering, storing and maintaining the proper types of spill recovery equipment and material, and that adequate amounts of spill recovery materials are available to all areas.

## Observation of Potential Spill

In an area where there is potential for release of a harmful substance or oil into the environment or sanitary sewer, personnel on each shift will be instructed as to what action must be taken when a spill occurs. All corrective action must be taken immediately.

#### Action by Department and Foreman

Immediately upon observation or notification of a harmful substance or oil being spilled, the foreman will investigate the condition.

- (1) If the harmful substance or oil is contained within the work place and there is no chance of release into the environment, the supervisor will notify the appropriate department and have the spill cleaned up. He will also discuss with the superintendent concerned, the steps necessary to prevent a recurrence.
- (2) If there is the slightest chance that the harmful substance or oil may be released into the environment or sanitary sewer, the foreman of the department will take immediate steps to contain the substance with whatever materials, manpower and equipment are on hand, and immediately report the spill in accordance with the reporting chart on Page 32.

The supe intendent of the responsible de, rtment will conduct an investigation into the causes for the spill. The investigation will include recommendations for prevention of recurrence and a subsequent timetable of implementation.

## Action by Maintenance Department

It will be the responsibility of the Environmental Control Department to immediately go to the spill area and confirm that the necessary steps are being taken to restrict the release into the environment or sanitary sewers. Environmental Control will also be responsible to see that the necessary steps are being taken by the Maintenance Department to collect the spilled substance at the point of spillage.

The cleanup crew will remain at the spill area until the Environmental Control Department concludes that the cleanup operation is completed or until the supervisor and the crew are relieved by the succeeding shifts.

This section must be completed immediately:

The department superintendent will determine the area of contamination. He will note the time of the call and determine the type and volume of the spill and the probability of release into the environment or a publicly owned sewage treatment plant. He will immediately notify the Environmental Control Superintendent and the District Manager's Office.

### Action by Reportir Group

It is imperative that the National Response Center be notified if oil has reached the public waters or if a hazardous substance has reached the environment in a reportable amount. If the spill is into a sanitary sewer, the N.E.O. Regional Sewer District shall be notified immediately.

Environmental Control supervision will notify, by phone, the appropriate governmental agencies:

- (a) National Response Center 1-800-424-8802
- (b) Ohio E.P.A. 1-800-282-9378
- (c) Coast Guard (216) 522-4404
- *(d) Northeast Ohio Regional Sewer District (216) 641-3200

The information needed for this report includes the following:

- (a) Type of material spilled
- (b) Point of entry to the environment
- (c) Estimated volume of material which entered the environment
- (d) Source
- (e) Cause
- (f) Duration
- (g) Injuries or property damage
- (h) Other relevant circumstances
- (i) Corrective actions taken

In addition, the District Manager's Office should be notified - (216) 622-6006.

No later than one week after the spill, the incident report will be confirmed in writing to appropriate agencies. In addition, it is necessary to report permanent measures being taken to prevent recurrences of the spill. The permanent measures shall be worked out with the Engineering Department and a record of it shall be incorporated in this report.

^{*}If the spill is into a sanitary sewer, the N.E.O. Regional Sewer District ONLY will be called. If the spill goes into the storm sewers leading to public waterways, all other agencies will be called and NOT the N.E.O. Regional Sewer District.

# as a public steel

# Interoffice Correspondence

CLEVELAND DISTRICT

District-Division-Subsidiary

ENGINEERING

Office

Date:

2 May '83

OHDOGLIZISA 73 PAJG, TRUITO, PASI

MAY - 6 .003

Name .

E.P.A. - CHICAGO

MA

ANCH

Title:

le:

EVENTION CONTROL AND

Our records indicate that you are assigned SPILL PREVENTION CONTROL AND COUNTERMEASURE book number ______.

Original book and revisions were sent to:

SAME

Please substitute the following revised data in your assigned book:

DATA SHEET	MAP NO.
Area 1 - Steel Plant	M-1096-B
Area 4 - Coke Plant No. 1 (3 Sheets)	M-1099-B
Area 5 - Shops	M-1102-B
Area 6 - Car Repair Yard	M-1098-B
Area 8 - Blast Furnace 5 and 6	M-1097-B
Area 9 - Strip Mill (2 Sheets)	M-1100-B1,2,3

Ev

D. E. HILFER

Civil Project Engineer

D. F. HAVEL

Area Engineer

Cleveland District

Enclosure

cc: File



## SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

# GENERAL INFORMATION

Republic Steel Corporation Cleveland District Cuyahoga County State of Ohio

Mail Address: Republic Steel Corporation P.O. Box 6778 Cleveland, Ohio 44101

## Persons Responsible:

•		Plant Phone
J. F. Carter R. L. Nemeth S. Rihtar	General Superintendent Environmental Control Superintendent Regulations Supervisor	622-6006 622-6370 622-6396

# SPILL RECORD

Refer to Appendix G for recent spill history.

# PREDICTION OF POTENTIAL SPILLS

The nearest navigable waterway is the Cuyahoga River.

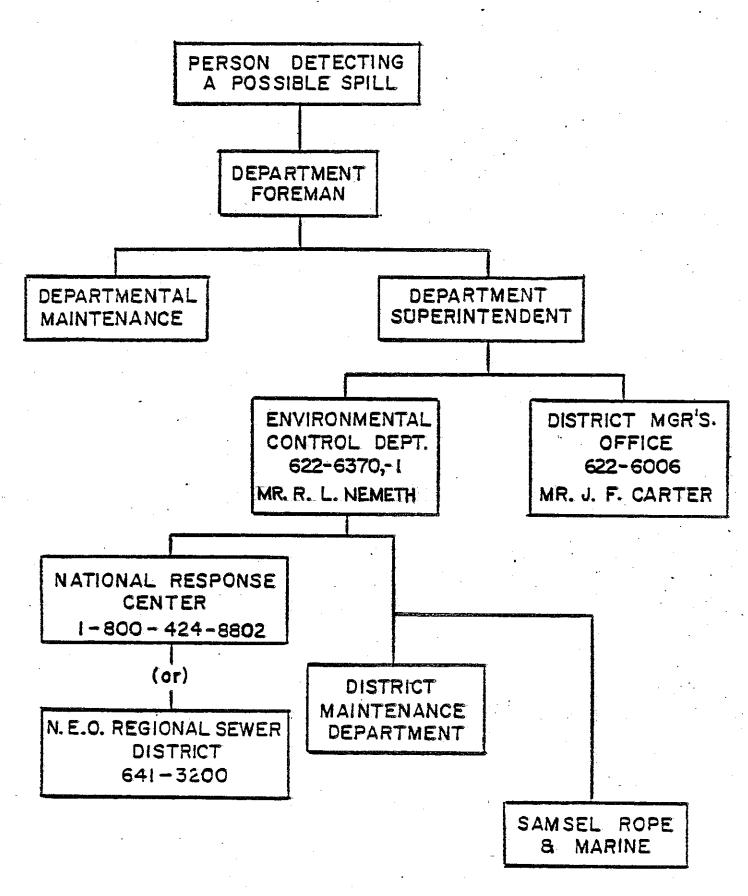
The possible spill sources are indicated on the attached sheets.

### SPILL PREVENTION PLAN CHECKLIST

- Secondary containment and/or diversionary structures used for possible spill sources are indicated on the attached sheets. Drawings of the new containments are also attached.
- 3A) The existing dike storage areas have no facilities for drainage.
- 3B) All bulk storage tanks, above ground, will have a secondary containment greater than the largest single tank capacity plus an allowance for rain water.

2.4	Name of Pla Republic Steel Corporat n - Cleveland District	
	Type of Plant Iron and Steel Manufacturing	
	Location of Plant 3100 East 45th Street	
	Name and Address of Owner	
	Name Republic Steel Corporation	
	Address Republic Building	
	Cleveland	
	Ohio	
	Designated person in charge of facility	
	Name J. P. Charles, District Manager	
	Designated person responsible for oil spill prevention	
	Name R. L. Nemeth, Superintendent, Environmental Control	
٠		
2.5	Management Approval	
	This SPCC Plan will be implemented as herein described  Signature P. Chalee	
	Name J. P. Charles	
·.	Title District Manager	
2.6	Registered Engineers Certification	
	I hereby certify that I have examined the facility and being familiar	٠
	with the provisions of Title 40 CFR, Part 112 attest that this SPCC	
•	plan has been prepared in accordance with good engineering practices.	
	AT 27 47 47 47 47 47 47 47 47 47 47 47 47 47	
	Name of Registered Professional Engineer Consulting Engineers	C:
	A Daine	
(	Signature of Registered Professional Engineer # 6.025444 /	1
	Registration No. D-026443 State Ohio	
	Date - Mary You File	

5



Rev. 2/16/83

#### APPENDIX G

## NAME OF PLANT: Republic Steel Corporation (Cleveland District)

#### CHARGEABLE SPILLS HISTORY

Page 1 of 2 POLLUTANT AMOUNT MEP CAUSE DATE SOURCE/DEPT. DISCHARGED DISCHARGED CASE NO. 27 FEB 78 1103-78 Waste Oil 100 Gals. Pump Failure F110/Env. Control 19 AUG 78 Bunker "C" 20-30 Gals. Fuel Injection F050/#6 Blst. Fce. 1403-78 Lance F090/#1 Coke Plant Power Failure 1000 Gals. 1480-78 05 OCT 78 Waste Oil F030/98" Cold Mill 3 Gals. 1513-78 05 DEC 78 Waste Oil Unknown Pump Stn. Failure F090/#1 Coke Plant 1616-78 08 NOV 78 Waste Oil 150 Gals. 07 DEC 78 35 Gals. Unknown F090/#1 Coke Plant 1530-78 Oil F030/98" Cold Mill 1531-78 21 DEC 78 Waste Oil 2 Gals. Unknown 22 JAN 79 -125 Gals. Unknown F090/#1 Coke Plant 1021-79 Wash Oil 5 Gals. F090/#1 Coke Plant 1022-79 20 JAN 79 Oil Unknown F030/98" Cold Mill 05 JAN 79 Oil 2 Gals. Unknown 1051-79 08 MAR 79 #6 Fuel Oil 20 Gals. Fuel Injection F150/#1 Blst. Fce. 1054-79 Lance. 20 Gals. Pipeline Leak Fuel Dock/Combstn. 01 APR 79 #6 Fuel Oil 1126-79 29 APR 79 #6 Fuel Oil 300 Gals. Broken Line F150/#1 Blst. Fce. 1130-79 11 MAY 79 10 Gals. Pump Failure F040/98" Cold Mill 1254-79 Coating Oil - 1299-79 22 SEP 79 Waste Oil 5 Gals. Unknown F030/98" Cold Mill 1301-79 28 JUN 79 Hydraulic Oil 20 Gals. Faulty Valve F040/Env. Control F090/#1 Coke Plant 200 Gals. Quench Pit Sump 1334-79 26 APR 79 Oil 1427-79 09 OCT 79 Hydraulic Oil 20 Gals. Unknown F150/#1-4 Blst. Fce. Unknown F090/#1 Coke Plant 1080-80 12 FEB 80 Oil .30 Gals. 10 Gals. Unknown F030/98" Cold Mill 1107-80 18 MAR 80 Oil 4 Gals. Tank Explosion F090/#1 Coke Plant 1111-80 11 MAY 80 Tar F090/#1 Coke Plant 1157-80 22 MAY 80 Wash Oil 500 Gals. Unsealed Sewer 1198-80 08 NUL E0 Oil 20 Gals. Coke Gas Drips F020/Combstn. Lube Oil 30 Gals. F090/East Side Stm. 1259-80 19 SEP 80 Open Line 400 Gals. F150/River Terminal Waste Oil Improper Disposal 1291-80 08 SEP 80 14 AUG 80 400 Gals. Loose Plug in Sump F090/#1 Coke Plant 1277-80 Waste Oil 5 Gals. Ruptured Pipeline F100/45" Mill 1315-80 28 SEP 80 Gear Oil F030/98" Cold Mill 230 Gals. Ruptured Water Pipe 1038-81 06 JAN 81 Oil 15 Gals. No. 6 Oil Floor Drain Buckled F150/#1 Blst. Fce. 1169-81 10 JUL 81 Due to Heat F020 16 JUN 81 Oil l Gal. Unknown 1168-81 05 MAY 81 Unknown F150/#1 Blst. Fce. No. 6 Fuel Oil 5 Gals. 1074-81 REVISED: 2/15/83

# APPENDIX G

NAME OF PLANT: Republic Steel Corporation (Cleveland District)

# CHARGEABLE SPILLS HISTORY

MED	,	DOT T. TURN AND	7.100		Page 2 of 2
MEP SE NO.	DATE	POLLUTANT DISCHARGED	AMOUNT DISCHARGED	CAUSE	SOURCE/DEPT.
1019-81	25 FEB 81	Coke Oil	45 Gals.	Coke Gas Drips	Morgana/#1 Coke Plant
1180-81	27 MAY 81	Oil	30 Gals.	Unknown	F030/98" Cold Mill
1178-81	30 JUN 81	Waste Oil	7 Gals.	Sewer Repair	F020
1179-81	10 SEP 81	Oil	Sheen	Sewer Line Repair	F150/#1 Blst. Fce.
1174-81	23 SEP 81	Tar	Sheen	Blockage and Overflow	F090/#1 Coke Plant
1184-81	ll nov 81	No. 6 Fuel Oil	5 Gals.	Oil Injection Lance	F150/#1 Blst. Fce.
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REVISED:	2/15/83	. ,	ļ		

# RECEIVED

Republicsteel

DEC 1 31982

Republic Steel Corporation Cleveland District 3100 East 45th Street Cleveland OH 44127

WASTE MANAGEMENT BRANCH EPA, REGION V

December 7, 1982

U.S. Environmental Protection Agency Region V RCRA Activities P.O. Box 7861 Chicago, Illinois 60680

OHD 004 218 673 PTA GENTRS TSD 1

Dear Sir or Madam:

Subject: SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

REVISIONS

Enclosed, please find revisions to the Republic Steel Corporation, Cleveland District's S.P.C.C. Plan, involving the following section:

Spill Alert Plan; Pages 28, 29, 30, 31 and 32.

Please substitute these pages in your copy of the S.P.C.C. Plan book.

Should you require any additional information, please contact the undersigned at (216) 622-6371.

Very truly yours,

S. Rihtar

Regulations Supervisor

Environmental Control Department

SR:db

Enclosures

cc & encs: E.P.A. - Twinsburg

Northeast Ohio Regional Sewer District

File: 0.55.0-165.00

14/13/82

#### SPILL ALERT PLAN

#### General

All personnel will be instructed on the problems and penalties that exist when a harmful substance is allowed to be deposited in any sewer that will pollute public waters or a publicly owned sewage treatment plant. Specific training instructions will be developed for supervisors responsible for the proper procedure for spill notification and cleanup to ensure prompt and correct action. The Environmental Control Department will be responsible for ordering, storing and maintaining the proper types of spill recovery equipment and material and that adequate amounts of spill recovery materials are available to all areas.

Revised: 11/10/82

## Observation of Potential Spill

In an area where there is potential for discharge of a harmful substance into a storm or sanitary sewer, personnel on each shift will be instructed as to what action must be taken when a spill occurs. All corrective action must be taken immediately.

## Action by Department and Foreman

Immediately upon observation or notification of a harmful substance being spilled, the foreman will investigate the condition.

- (1) If the harmful substance is contained in a small area and there is no chance of it reaching a sewer, the supervisor will call the appropriate department and have the spill cleaned up. He will also discuss with the superintendent concerned, the steps necessary to prevent a recurrence.
- (2) If there is the slightest chance that the harmful substance may be discharged to a storm or sanitary sewer, the foreman of the department will take immediate steps to contain the substance with whatever materials, manpower, and equipment are on hand and report the spill in accordance with the reporting chart on Page 32.

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Revised: 11/10/82

The superintendent of the responsible department will conduct an investigation into the causes for the discharge. The investigation will include recommendations for prevention of recurrence and a subsequent timetable of implementation.

#### Action by Maintenance Department

It will be the responsibility of the Environmental Control Department to immediately go to the spill area and make certain that the necessary steps are being taken to restrict the amount of the spill going to the sewers. Environmental Control will also be responsible to see that the necessary steps are being taken to collect the spilled substance at the point of spillage.

The cleanup crew will remain at the spill area until the Environmental Control

Department concludes that the cleanup operation is completed or until the supervisor and the crew is relieved by the succeeding shifts.

As noted in the paragraph below, it is imperative that the Coast Guard be notified of the spill into a storm sewer within one hour if it is to be called an accidental spill. If the spill is into a sanitary sewer, then the call must be made within one hour to the N.E.O. Regional Sewer District.

This section must be completed within a 15-minute period.

The department superintendent will immediately determine the area of contamination. He will note the time of the call and determine the type and volume of the spill and the probability of polluting either public waters or a publicly owned sewage treatment plant. He will, within 15 minutes or as soon as possible, notify the Environmental Control Superintendent and the District Manager's Office.

30

### Action by Reporting Group

Environmental Control supervision will notify by phone the appropriate governmental agencies:

- (a) National Response Center 1-800-424-8802
- (b) Coast Guard (216) 522-4404
- (c) State Office Ohio E.P.A. Columbus (614) 299-6336
- (d) Cleveland Office Federal E.P.A. (216) 333-7556
- (e) District Office Ohio E.P.A. Twinsburg (216) 425-9171
- *(f) Northeast Ohio Regional Sewer District (216) 641-3200

The information needed for this report includes the following:

- (a) Type of material spilled.
- (b) Point of entry to public waters.
- (c) Estimated volume of material which entered public waters.

In addition, the District Manager's Office should be notified - (216) 622-6006.

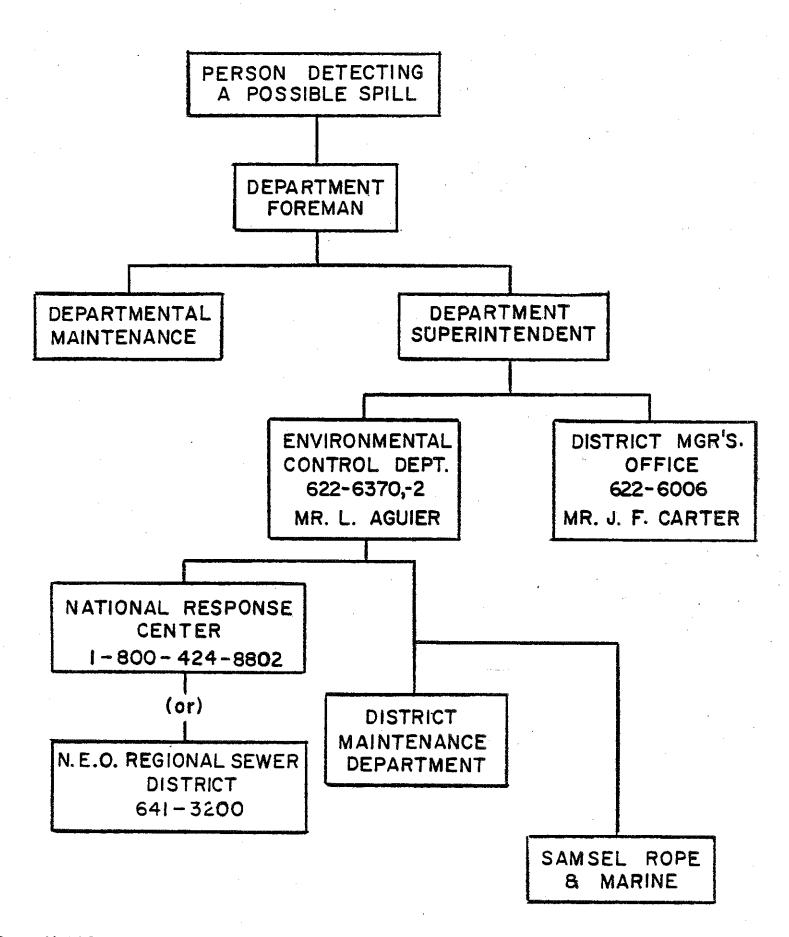
Within one week of the spill, the incident report will be confirmed in writing to appropriate agencies. In addition, it is necessary to report permanent measures being taken to prevent recurrences of the spill. The permanent measures shall be worked out with the Engineering Department and a record of it shall be incorporated in this report.

* If the spill is into a sanitary sewer, the N.E.O. Regional Sewer District

ONLY will be called. If the spill goes into the storm sewers leading to

public waterways, all other agencies will be called and NOT the N.E.O.

Regional Sewer District.



# Land esteel

Republic Steel Corporation Cleveland District 3100 East 45th Street Cleveland OH 44127

December 7, 1982

Northeast Ohio Regional Sewer District Administration Office Cleveland Plaza Cleveland, Ohio 44115

Dear Sir or Madam:

Subject: SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

REVISIONS

Enclosed, please find revisions to the Republic Steel Corporation, Cleveland District's S.P.C.C. Plan, involving the following section:

Spill Alert Plan; Pages 28, 29, 30, 31 and 32.

Please substitute these pages in your copy of the S.P.C.C. Plan book.

Should you require any additional information, please contact the undersigned at 622-6371.

Very truly yours,

S. Rihtar

Regulations Supervisor

Environmental Control Department

SR:db

Enclosures

cc & encs: J. F. Weber - NE.O.R.S.D.

E.P.A. - Chicago E.P.A. - Twinsburg File: 0.55.0-165.00

# Terminasteel

Republic Steel Corporation Cleveland District 3100 East 45th Street Cleveland OH 44127

December 7, 1982

Ohio Environmental Protection Agency Northeast District Office 2110 East Aurora Road Twinsburg, Ohio 44087

Dear Sir or Madam:

Subject: SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

REVISIONS

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Very truly yours,

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Enclosures

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Northeast Ohio Regional Sewer District

File: 0.55.0-165.00

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# REPUBLIC STEEL CORPORATION - CLEVELAND SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

EV.NO. 1 DATE 11.

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T 163	11,500	FUEL OIL	10'-0"	21-0"	SK-11376	A		DIKE	SK:11376	NO	NONE
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T 165	11,500	FUEL OIL	10'-0"	21-0"	5575	A	PUMP HSE	***************************************	147491	86	H H W DO H
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T 168	1,000	LUBE OIL	4'-0'x 4'-5"	10'-0"	35023	В	44" MILL	<u> </u>	34535		NONE - OIL CELLAR DRAIN PLUGGED
T 169	2,200	RECLAIMOIL	5'-0"	14'-0"		A		DIKE	147493		BUILD DIKE - COMPLETED
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# REPUBLIC STEEL CORPORATION - CLEVELAND SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

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AREA 4 PLANT COKE PL. NO. I
GEN. ARRGT. DWG. M·1099·B

# REPUBLIC STEEL CORPORATION - CLEVELAND SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

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TANK	1/01	H&W o					TYPE			81 tı 4 tı
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T431	10,000 WASH OII			131606	A		CURB	147474	OUTFALL 009	BUILD CURBCOMPLE
T432	10,000 WASH OI		90.0	131606	A		11	••	OUTFALL 009	BUILD CURB " "
@T 433	10,000 Nº2 DIESE		<del></del>	131606	A		. •1	BQ	OUTFALL 009	BUILD CURB " "
T434	1,000 CONTAM, O		<b>26.67</b> 7.0	159008	В		N.R.		NO	NONE
® T435	15,000 WASH OI	. 1	+	130393	В		N.R.		NO	NONE - TANK REMOVED
⁹ T436	15,000 WASH OIL		58.0	129466	A		DIKE	147473	OUTFALL 009	BUILD DIKECOMPLET
T437	15,750 LT. TAR DE		58.0	129466	Α		ŧi.	11	OUTFALL 009	BUILD DIKE - " "
T438			20.0	129493	A		DIKE	147477	OUTFALL 009	BUILD DIKE - " "
T439		13.5 x 16.0		134437	A		16	•1	OUTFALL 009	BUILD DIKE - "
T440		3.5 x 16.0	·	134437	A		а	64	OUTFALL 009	BUILD DIKE - "
T441			25.5	134432	A		11	Þ¢	OUTFALL 009	BUILD DIKE - "
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T443		12.5 x 14.0	49.75	124858	Α		. 84	\$I	OUTFALL 009	BUILD DIKE - "
		. 12.5 x 14.0	49.75	124858	A		**	to.	OUTFALL 009	BIRLD DIVE
T444	20,000 LT. OIL	12.0	25.5	130179	Α		DIKE	130280	NO	NONE
T445	92,000 LT.OIL DE		65.0	130172	Α		DIKE		NO	NONE
T446	12,000 SEALOIL		21.0	25343	Α		TRENCH		NO	PLUG WEEP HOLES
T447	12,000 SEALOIL		21.0	25343	Α		TRENCH		NO	11 11 11
T448	3,400 SEALOIL	5 x 6	15.0		Α			·····	NO	NONE
@T449	2,000 LT. OIL	10.5	35.0	130384	Α		CURB	154752	OUTFALL 009	
T 450								· · · · · · · · · · · · · · · · · · ·	00117122	BUILD CURB - COMPLETED
T451 P	46,000 LT.OIL	15.0	36.0	130366	Α		DIKE	130746	NO	NONE - TANK REMOVED
T452 P	44,000 RES.PROD	15.0	33.75	130366	Α		DIKE	130746	NO	NONE " "
T453 P	50,000 LT.OIL	15.0	40.0	130366	Α		DIKE	130746	NO	NONE " "
T 454 P	44,000 RESIDUE	15.0	33.75	130366	Α		DIKE	130746	<u> </u>	NONE " "
<b>⊕T 455 P</b>	50,000 LT.OIL	15.0	40.0	130365	Α		DIKE	130746	<u> </u>	NOIVE
<b>T 456 P</b>	50,000 LT.OIL	15.0	40.0	130365	Α		DIKE	130746	NO	NONE
T457 P	50,000 LT. OIL	15.0	40.0	130365	A		DIKE	130746	NO	NONE
<b>⊕T 458 P</b>	150,000 BENZOL	25.0	42.0	130364	A		DIKE	130729	NO	NONE - CONVERTED TO WATER STORA
_T459 P	150,000 BENZOL	25.0		130364	A		DIKE	130740	NO	NONE 16 86 60 80
T460 P	150,000 TOLUOL	25.0	42.0	130364	Α		DIKE	130746		NONE
T461 P	50,000	15.0	400	130367	A		DIKE		NO	NONE
T462 P	50,000 TXP	15.0		130367	A		DIKE	13-0746	NO	NONE -CONVERTED TO WATER STORA
T 463 P	50,000 BTX	15.0		130368	A			130746	NO	NONE - TANK REMOVED
T464 P	50,000 BTX	15.0		130368	Ā		DIKE	130746	NO	NONE
T465 P	50,000 XYLOL	15.0		130368	A		DIKE	130746	NO	NONE
T466 P	50,000 HVY.SOL.	15.0		130368		-	DIKE	130740	NO	NONE
T467 P	50,000 TOLUOL	15.0		130369	A		DIKE	130740	NO	NONE
T468 P	50,000 TOLUOL	15.0		130369	A			130740	NO	NONE
FORM#2	,	- 10.0	70.0	130309	A		DIKE	130740	NO	NONE
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AREA 4 PLANT COKE PL. NO.I

GEN. ARRGT. DWG. M·1099·B

## REPUBLIC STEEL CORPORATION - CLEVELAND SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

REV.NO. 1 DATE 11/13 3/17/7 11 11 3 11 9/28

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VOL.		DIA.	LENGTH	DWG.	ABOVE-	- WITHIN		- DWG.	SPILL COULD ENTER	
GALS.	CONTENT	TANK TANK	TANK				MENT	NO.		CORRECTIVE PLAN OF ACTION
<u> </u>		15.0	40.0	130369	Α		DIKE	130729	NO	NONE
	O BENZOL	_ 15.0	40.0	130369	Α		DIKE	130729	NO	NONE
50,000	O RESIDUE	15.0	40.0	130370	Α		DIKE	<del></del>		NONE
50,000	RESIDUE	E 15.0	40.0	130370			DIKE			NONE
50,000	1	15.0	40.0	130371			DIKE	<del></del>		NONE - CONVERTED TO WATER STORAG
50,000	TPX	15.0	40.0	130371		<del>                                     </del>	<del></del>	<del></del>		NONE - TANK REMOVED
<del></del>	<del></del>	<del></del>	32.0	130372	· · · · · · · · · · · · · · · · · · ·		CURB	147475		BUILD CURB COMPLETED
<del></del>		25.0	42.0	129471	A		DIKE	<b> </b>		BUILD DIKE COMPLETED
	<del></del>	52.0	40.0	125701		+	ii ii	141471		DULL D. DIVE
		52.0	40.0	129465	<del></del>	+	11	11	<del>-   -   -   -   -   -   -   -   -   -  </del>	Street Street
<del> •</del>		-	+				+		TOUTFALL COS	BUILD DIKE — " "
1.000,000	NO 6 FUEL	65.0	40.0		+ A	+	DIKE	122473 ¥	4 NO	NOME TANK DEMOVED (1070)
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30,000	STILL	11.5	42.0	130388	A		DIKE		NO	NONE "
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24,000	WASHOIL	11.5	40.0	129474	Α	1	DIKE	147473	OUTFALL 009	BUILD DIKE - COMPLETED
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	50,000 50,000 50,000 50,000 50,000 40,000 150,000 600,000 6,000 20,000 20,000 20,000 20,000 20,000 12,000 12,000 12,000 30,000 30,000 20,000	GALS.         CONTENT           50,000         BENZOL           50,000         RESIDUE           50,000         RESIDUE           50,000         TPX           40,000         WASH OIL           I50,000         TAR           600,000         TAR           600,000         TAR           I,000,000         NO 6 FUEL           500,000         NO 6 FUEL           6,000         OIL           20,000         BT 8 TX           20,000         XYLOL           20,000         HVYSOL           20,000         XYLOL           20,000         NIT.BENZOL           20,000         WASHOIL           I2,000         WASHOIL           I2,000         WASHOIL           30,000         STILL	VOL.         DIA.           GALS.         CONTENT         TANK           50,000         BENZOL         I5.0           50,000         BENZOL         I5.0           50,000         RESIDUE         I5.0           50,000         RESIDUE         I5.0           50,000         TPX         I5.0           50,000         TPX         I5.0           40,000         WASH OIL         I5.0           150,000         TAR         52.0           600,000         TAR         52.0           600,000         TAR         52.0           1,000,000         NO 6 FUEL         65.0           500,000         NO 6 FUEL         50.0           6,000         OIL         10.0           20,000         BT 8 TX         15.0           20,000         BT 8 TX         15.0           20,000         XYLOL         15.0           20,000         XYLOL         15.0           20,000         NIT.BENZOL         15.0           12,000         WASHOIL         11.5           12,000         WASHOIL         11.5           30,000         STILL         11.5 <td< td=""><td>VOL.         GALS.         CONTENT         TANK         TANK           50,000         BENZOL         I5.0         40.0           50,000         BENZOL         I5.0         40.0           50,000         RESIDUE         I5.0         40.0           50,000         RESIDUE         I5.0         40.0           50,000         TPX         I5.0         40.0           50,000         TPX         I5.0         40.0           40,000         WASH OIL         I5.0         32.0           I50,000         LT. TAR         25.0         42.0           600,000         TAR         52.0         40.0           600,000         TAR         52.0         40.0           500,000         NO 6 FUEL         65.0         40.0           500,000         NO 6 FUEL         50.0         35.5           6,000         OIL         I0.0         I0.5           20,000         XYLOL         I5.0         I6.0           20,000         XYLOL         I5.0         I6.0           20,000         XYLOL         I5.0         I6.0           20,000         HVY.SOL         I5.0         I6.0           20,00</td><td>VOL.         CONTENT         TANK         LENGTH TANK         DWG.           50,000         BENZOL         15.0         40.0         130369           50,000         BENZOL         15.0         40.0         130369           50,000         RESIDUE         15.0         40.0         130370           50,000         RESIDUE         15.0         40.0         130370           50,000         TPX         15.0         40.0         130371           40,000         WASH OIL         15.0         32.0         130372           150,000         LT. TAR         25.0         42.0         129471           600,000         TAR         52.0         40.0         125701           600,000         TAR         52.0         40.0         129465           1,000,000         NO 6 FUEL         65.0         40.0         129465           1,000,000         NO 6 FUEL         50.0         35.5         21679           6,000         OIL         10.0         10.5         130,375           20,000         XYLOL         15.0         16.0         130373           20,000         XYLOL         15.0         16.0         130373</td><td>VOL. GALS.         CONTENT         TANK         LENGTH TANK         DWG. NO.         BELOW GR           50,000         BENZOL         15.0         40.0         130369         A           50,000         BENZOL         15.0         40.0         130369         A           50,000         RESIDUE         15.0         40.0         130370         A           50,000         RESIDUE         15.0         40.0         130370         A           50,000         RESIDUE         15.0         40.0         130371         A           50,000         TPX         15.0         40.0         130371         A           40,000         WASH OIL         15.0         32.0         130372         A           150,000         LT. TAR         25.0         42.0         129471         A           600,000         TAR         52.0         40.0         129465         A           1,000,000         NO6 FUEL         65.0         40.0         129465         A           20,000         BT 8 TX         15.0         16.0         130,375         A           20,000         BT 8 TX         15.0         16.0         130373         A</td><td>VOL. GALS.         CONTENT CONTENT         DIA. TANK         LENGTH TANK         DWG. NO.         ABOVE – BELOW GR.         WITHIN BLOG           50,000         BENZOL         15.0         40.0         130369         A           50,000         BENZOL         15.0         40.0         130369         A           50,000         RESIDUE         15.0         40.0         130370         A           50,000         RESIDUE         15.0         40.0         130371         A           50,000         TPX         15.0         40.0         130371         A           50,000         TPX         15.0         40.0         130371         A           40,000         WASH OIL         15.0         32.0         130372         A           150,000         LT.TAR         25.0         42.0         129471         A           600,000         TAR         52.0         40.0         129465         A           1,000,000         NO6 FUEL         65.0         40.0         129465         A           20,000         BT 8 TX         15.0         16.0         130,375         A           20,000         BT 8 TX         15.0         16.0         130,37</td><td>VOL. GALS.         CONTENT         TANK         LENGTH TANK         DWG. NO.         ABOVE— WITHIN BELOW GR. BLDG         CONTAINMENT           50,000         BENZOL         IS.O         40.0         I30369         A         DIKE           50,000         BENZOL         IS.O         40.0         I30369         A         DIKE           50,000         RESIDUE         IS.O         40.0         I30370         A         DIKE           50,000         RESIDUE         IS.O         40.0         I30370         A         DIKE           50,000         RESIDUE         IS.O         40.0         I30371         A         DIKE           50,000         TPX         IS.O         40.0         I30371         A         DIKE           50,000         TPX         IS.O         40.0         I30371         A         DIKE           600,000         LT.TAR         25.0         42.0         I29471         A         DIKE           600,000         TAR         52.0         40.0         I29465         A         "           I,000,000         NO6 FUEL         65.0         40.0         I30,375         A         DIKE           20,000         BT 8.TX</td><td>VOL. GALS.         CONTENT         DIA. TANK         LENGTH TANK         DWG. BELOG R         ABOVE—BLDG MENT         CONTAIN- NO.         DWG. MENT         NO.           50,000         BENZOL.         15.0         40.0         130369         A         DIKE         130729           50,000         BENZOL.         15.0         40.0         130370         A         DIKE         130703           50,000         RESIDUE         15.0         40.0         130370         A         DIKE         130703           50,000         RESIDUE         15.0         40.0         130371         A         DIKE         130703           50,000         TPX         15.0         40.0         130371         A         DIKE         130704           50,000         TPX         15.0         40.0         130371         A         DIKE         130704           40,000         WASH OIL         15.0         32.0         130372         A         CURB         147475           150,000         LT.TAR         25.0         42.0         129471         A         DIKE         147477           600,000         TAR         52.0         40.0         129466         A         DIKE         <t< td=""><td>VOL. GALS.         DIA. TANK         LENGTH TANK ANK         DWG. BELOW GR         WITHIN BLOW GR         CONTAIN BLOW GR         BYG. WATERWAY VIA.           50,000         BENZOL.         15.0         40.0         130369         A         DIKE         130729         NO           50,000         BENZOL.         15.0         40.0         130369         A         DIKE         130729         NO           50,000         BENZOL.         15.0         40.0         130370         A         DIKE         130703         NO           50,000         RESIDUE         15.0         40.0         130371         A         DIKE         130703         NO           50,000         TPX         15.0         40.0         130371         A         DIKE         130746         NO           40,000         WASH OIL         15.0         32.0         130372         A         CURB 147475         OUTFALL         009           150,000         LT TAR         25.0         42.0         129471         A         DIKE         147477         OUTFALL         009           600,000         TAR         52.0         40.0         129465         A         BIKE         147477         OUTFALL         0</td></t<></td></td<>	VOL.         GALS.         CONTENT         TANK         TANK           50,000         BENZOL         I5.0         40.0           50,000         BENZOL         I5.0         40.0           50,000         RESIDUE         I5.0         40.0           50,000         RESIDUE         I5.0         40.0           50,000         TPX         I5.0         40.0           50,000         TPX         I5.0         40.0           40,000         WASH OIL         I5.0         32.0           I50,000         LT. TAR         25.0         42.0           600,000         TAR         52.0         40.0           600,000         TAR         52.0         40.0           500,000         NO 6 FUEL         65.0         40.0           500,000         NO 6 FUEL         50.0         35.5           6,000         OIL         I0.0         I0.5           20,000         XYLOL         I5.0         I6.0           20,000         XYLOL         I5.0         I6.0           20,000         XYLOL         I5.0         I6.0           20,000         HVY.SOL         I5.0         I6.0           20,00	VOL.         CONTENT         TANK         LENGTH TANK         DWG.           50,000         BENZOL         15.0         40.0         130369           50,000         BENZOL         15.0         40.0         130369           50,000         RESIDUE         15.0         40.0         130370           50,000         RESIDUE         15.0         40.0         130370           50,000         TPX         15.0         40.0         130371           40,000         WASH OIL         15.0         32.0         130372           150,000         LT. TAR         25.0         42.0         129471           600,000         TAR         52.0         40.0         125701           600,000         TAR         52.0         40.0         129465           1,000,000         NO 6 FUEL         65.0         40.0         129465           1,000,000         NO 6 FUEL         50.0         35.5         21679           6,000         OIL         10.0         10.5         130,375           20,000         XYLOL         15.0         16.0         130373           20,000         XYLOL         15.0         16.0         130373	VOL. GALS.         CONTENT         TANK         LENGTH TANK         DWG. NO.         BELOW GR           50,000         BENZOL         15.0         40.0         130369         A           50,000         BENZOL         15.0         40.0         130369         A           50,000         RESIDUE         15.0         40.0         130370         A           50,000         RESIDUE         15.0         40.0         130370         A           50,000         RESIDUE         15.0         40.0         130371         A           50,000         TPX         15.0         40.0         130371         A           40,000         WASH OIL         15.0         32.0         130372         A           150,000         LT. TAR         25.0         42.0         129471         A           600,000         TAR         52.0         40.0         129465         A           1,000,000         NO6 FUEL         65.0         40.0         129465         A           20,000         BT 8 TX         15.0         16.0         130,375         A           20,000         BT 8 TX         15.0         16.0         130373         A	VOL. GALS.         CONTENT CONTENT         DIA. TANK         LENGTH TANK         DWG. NO.         ABOVE – BELOW GR.         WITHIN BLOG           50,000         BENZOL         15.0         40.0         130369         A           50,000         BENZOL         15.0         40.0         130369         A           50,000         RESIDUE         15.0         40.0         130370         A           50,000         RESIDUE         15.0         40.0         130371         A           50,000         TPX         15.0         40.0         130371         A           50,000         TPX         15.0         40.0         130371         A           40,000         WASH OIL         15.0         32.0         130372         A           150,000         LT.TAR         25.0         42.0         129471         A           600,000         TAR         52.0         40.0         129465         A           1,000,000         NO6 FUEL         65.0         40.0         129465         A           20,000         BT 8 TX         15.0         16.0         130,375         A           20,000         BT 8 TX         15.0         16.0         130,37	VOL. GALS.         CONTENT         TANK         LENGTH TANK         DWG. NO.         ABOVE— WITHIN BELOW GR. BLDG         CONTAINMENT           50,000         BENZOL         IS.O         40.0         I30369         A         DIKE           50,000         BENZOL         IS.O         40.0         I30369         A         DIKE           50,000         RESIDUE         IS.O         40.0         I30370         A         DIKE           50,000         RESIDUE         IS.O         40.0         I30370         A         DIKE           50,000         RESIDUE         IS.O         40.0         I30371         A         DIKE           50,000         TPX         IS.O         40.0         I30371         A         DIKE           50,000         TPX         IS.O         40.0         I30371         A         DIKE           600,000         LT.TAR         25.0         42.0         I29471         A         DIKE           600,000         TAR         52.0         40.0         I29465         A         "           I,000,000         NO6 FUEL         65.0         40.0         I30,375         A         DIKE           20,000         BT 8.TX	VOL. GALS.         CONTENT         DIA. TANK         LENGTH TANK         DWG. BELOG R         ABOVE—BLDG MENT         CONTAIN- NO.         DWG. MENT         NO.           50,000         BENZOL.         15.0         40.0         130369         A         DIKE         130729           50,000         BENZOL.         15.0         40.0         130370         A         DIKE         130703           50,000         RESIDUE         15.0         40.0         130370         A         DIKE         130703           50,000         RESIDUE         15.0         40.0         130371         A         DIKE         130703           50,000         TPX         15.0         40.0         130371         A         DIKE         130704           50,000         TPX         15.0         40.0         130371         A         DIKE         130704           40,000         WASH OIL         15.0         32.0         130372         A         CURB         147475           150,000         LT.TAR         25.0         42.0         129471         A         DIKE         147477           600,000         TAR         52.0         40.0         129466         A         DIKE <t< td=""><td>VOL. GALS.         DIA. TANK         LENGTH TANK ANK         DWG. BELOW GR         WITHIN BLOW GR         CONTAIN BLOW GR         BYG. WATERWAY VIA.           50,000         BENZOL.         15.0         40.0         130369         A         DIKE         130729         NO           50,000         BENZOL.         15.0         40.0         130369         A         DIKE         130729         NO           50,000         BENZOL.         15.0         40.0         130370         A         DIKE         130703         NO           50,000         RESIDUE         15.0         40.0         130371         A         DIKE         130703         NO           50,000         TPX         15.0         40.0         130371         A         DIKE         130746         NO           40,000         WASH OIL         15.0         32.0         130372         A         CURB 147475         OUTFALL         009           150,000         LT TAR         25.0         42.0         129471         A         DIKE         147477         OUTFALL         009           600,000         TAR         52.0         40.0         129465         A         BIKE         147477         OUTFALL         0</td></t<>	VOL. GALS.         DIA. TANK         LENGTH TANK ANK         DWG. BELOW GR         WITHIN BLOW GR         CONTAIN BLOW GR         BYG. WATERWAY VIA.           50,000         BENZOL.         15.0         40.0         130369         A         DIKE         130729         NO           50,000         BENZOL.         15.0         40.0         130369         A         DIKE         130729         NO           50,000         BENZOL.         15.0         40.0         130370         A         DIKE         130703         NO           50,000         RESIDUE         15.0         40.0         130371         A         DIKE         130703         NO           50,000         TPX         15.0         40.0         130371         A         DIKE         130746         NO           40,000         WASH OIL         15.0         32.0         130372         A         CURB 147475         OUTFALL         009           150,000         LT TAR         25.0         42.0         129471         A         DIKE         147477         OUTFALL         009           600,000         TAR         52.0         40.0         129465         A         BIKE         147477         OUTFALL         0

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GEN. ARRGT. DWG. ____ M·1102 · B

## REPUBLIC STEEL CORPORATION - CLEVELAND SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

TANK NO.	VOL. GALS.	CONTENT	H&W or DIA. TANK	LENGTH TANK	l DWG. NO.	ABOVE - BELOW GR.	WITHIN BLDG	TYPE CONTAIN- MENT	DWG.	SPILL COULD ENTER WATERWAY VIA.	CORRECTIVE BLAN OF ACTION
T 551				18.0		B		N.R.	IV.	NO WATERWAT VIA.	CORRECTIVE PLAN OF ACTION
T 552		2-DIESEL	8.0	21.5		В		N. R.		NO	NONE
T 553		SOLVENT	6.0	14.5		A	·····	N. R.			NONE
T 554		HEAT.OIL	OVAL	5.0		Α		N. R.			NONE — NOT APPLICABLE NONE
①T 555	1,040	WASTE OIL	4.0×7.0	5.0		Α	<del></del>	N.R.	· · · · · · · · · · · · · · · · · · ·	NO	NONE
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AREA 6 PLANT CAR REPAIR YD.

GEN. ARRGT. DWG. M·1098 · B

## REPUBLIC STEEL CORPORATION - CLEVELAND SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

REV. NO. 1 DATE 11/ 11 N 3 N 9/

**** A & 1 1 /			H&W or					TYPE			
TANK	VOL.	& & t 1	DIA.	LENGTH		ABOVE-		CONTAIN	- DWG.	SPILL COULD ENTER	
NO.		CONTENT	TANK	TANK	NO.	BELOW GR.	BLDG	MENT	NO.	WATERWAY VIA.	CORRECTIVE PLAN OF ACTION
T 651	3,000	2-DIESEL	6.5	12.0		Α	orania compressioni di primi di propinsioni di primi di primi di primi di primi di primi di primi di primi di p	DIKE	NONE	OUTFALL 009	RIVER TERMINAL TO DIKE - COMPLET
<b>③T 652</b>	7,000	2-DIESEL	6.5	28.0	NONE	Α	······································	DIKE	179770	NO	NONE - TANK REMOVED
<b>③T 653</b>	7,000	2-DIESEL	6.5	28.0	NONE	A		DIKE	179770	NO	NONE - TANK REMOVED
<b>3T 654</b>	10,100	2-DIESEL	7.25	34.75	NONE	A		DIKE	179770	NO	
<b>3T</b> 655	10,100	2-DIESEL	7.25	34.75	NONE	A		DIKE	179770	NO	NONE - (1981)
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AREA 8 PLANT BLAST F'CE 58 6 GEN. ARRGT. DWG. M.1097.B

REPUBLIC STEEL CORPORATION - CLEVELAND SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN REV.NO. 1 DATE 8/ 2 11/ 3 3/1 4 9/2 5 12/

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TANK	VOL.		DIA.	LENGTH	DWG.	ABOVE -	WITHIN	CONTAIN	- DWG.	SPILL COULD ENTER		
NO.		CONTENT		TANK		BELOW GR		MENT	NO.	WATERWAY VIA.	CORRECTIVE PLA	N OF ACTION
T 851 P	125,000	NO.6 FUEL	27.0	32.0	65353	A		LAGOON	147481	OUTFALL 006	BUILD CURB	
T 852 P			37.0	32.0	109420	А		01	88	OUTFALL 006		97
T 853 P	250,000	TAR	37.0	32.0	109420	Α		¢ ¢	80	OUTFALL 006	65 85	ı t
T 854 P	150,000	ВТХ	30.0	30.0	126783	A		DIKE	108217	NO	NONE	
T 855 P	11,300,000	NO.6 FUEL	200.0	48.0	138250	A		DIKE	137005	NO	NONE	
<b>AT 856</b>		(EMPTY)	10.0	34.0	126791	Α		LAGOON	147481	OUTFALL 006	BUILD CURB - TANK RE	FMOVED
T 857	20,000	WASH OIL	10.0	34.0	126803	А		LAGOON	147481	OUTFALL 006	BUILD "	
T 858	20,000	BTX	10.0	34.0	126827	Α		DIKE	108220	NO	NONE	
T 859	20,000	ВТХ	10.0	34.0	126827	Α		DIKE	108220	NO	NONE	
T 860	20,000	L.T. OIL	10.0	34.0	126827	А		DIKE	108220	NO	NONE	
T 861	20,000	WASH OIL	10.0	34.0	126827	Α		DIKE	108220	NO	NONE	
T 862	1,000	2-DIESEL	4.0	10.67		8		N.R.		NO	NONE	
T 863	15,000	TAR COLL.	8.0	40.0	109304	Α		LAGOON	147481	OUTFALL 006	BUILD CURB -	———COM
T 864	15,000	TAR COLL.	. 8.0	40.0	109304	Α		<b>\$</b> (1)	16	95	es de	11
T 865	15,000	TAR COLL	8.0	40.0	109304	A		61	11	4	# #	11
T 866	17,000	FUELOIL	10.5	29.75	SK.11527	Α		DIKE	<b>57</b> 573	NO	NONE	(ASHL
T 867	14,000	FUELOIL	10.0	25.0	SK.II526	Α		DIKE	57573	NO	NONE	(ASHL
T 868	170	L.O.RECT.	1.5	13.0	126830	Α		LAGOON	147481	OUTFALL 006	BUILD CURB	COMP
T 869	1,700	L.O. SEP.	5.0	13.0	109312	Α		11	H	45	60 14	11
T 870		L.O. SEP.	5.0	18.0	109312	Α		8.8	34	46	•	<b>19</b>
T 871	134,000	BENZ. WA.	15.0	102.0	109305	А		B	16 .	•	20 00	H
T 872	134,000	BENZ. WA.	15.0	102.0	109305	Α		11	10	. 43	35 44	
<u>(4)</u> T 873	79,000	FIN. COOL.	. 15.0	60.0	109297	Α		ta .	×	•	• • TANK	
(a)T 874	18,000	WASH OIL	8.0	49.0	109280	Α		94	ŧŧ		20 16 25	*
T 875	7,000	LT.OIL	6.0	34.5	109309	Α		l?	44	8	•	COMP
T 876	800	LT.OIL	5.0	6.0	126838	А		M	ŧ5		<b>10 4</b> 5	н
T 877	1,600	LT.OIL	3.0	31.5	109336	A		11	H	*		11
<b>⊕</b> ⊤ 878	6,700	WASH OIL	8.0	18.0	18482-27	А		P8	pa .	ď	* * TANK R	EMOVED
<u>AT 879</u>	250	2-DIESEL	3.0	5.0		Α	4.HULETT	N.R.			NONE "	*
T 880	<del> </del>	LUBEOIL	5 x 7	15.0	BOW.E-13532	Α	2-POWER	DIKE	147468	OUTFALL 006	BUILD DIKE -	COM
T 881			7.0 x 8.75	18.5	BOW.E-1603	0 A	2-POWER			<b>t</b> a	TANK REMOVED	
T 882	<del></del>	LT.OIL	8.0	26.5	126795	Α	SULF.STOR.	DIKE	SK.II267	NO	NONE	
E98 T		(EMPTY)		34.0		Α				NO	NONE (SEE SK.1248	5) - TANK REMO
●T 884 ·	2-57,000 COMPARTM <b>TS</b>	LIQ. DEC.	12.5 x 28.0	49.75	109298	Α		LAGOON	147481	OUTFALL 006	BUILD CURB - COMP	
			12.5 x 28.0	49.75	109299	Α		11	41	et to	20 20 10	
<b>T 886</b>	255,000			30.00	147426	Α		E4	14	6¢ 69	NONE - CURB BUILT (D	WG. 149843)
6T 887	3,100.	SLUDGE	9.5 × 10.16	3.0		Α				NO	NONE	***************************************
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FORM#2								**				

AREA 9 PLANT STRIP MILL

GEN. ARRGT. DWG. M.1100.BI, B2, B3

# REPUBLIC STEEL CORPORATION - CLEVELAND SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

REV.NO. 1 DATE 8/28

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		H&W or				· ·	TYPE	55 h 1 1 45	AND LANGE PRITER		
TANK	VOL.	DIA.	LENGTH	DWG.	ABOVE -		CONTAIN-	DWG. N⊜.	SPILL COULD ENTER WATERWAY VIA.	CORRECTIVE PLAN OF	FACTION
NO.	GALS. CONTENT	TANK	TANK	NO. E	BELOW GR.		MENT	147471	OUT FALL 003	BUILD DIKE	- COMPLETE
T 950	5,000 ROLLOIL	5.0 x 9.42	14.0		A	HYDRO	DIKE			BUILD DIKE -	11 11
T 951	5,000 ROLLOIL		14.0		A	HYDRO				BUILD DIKE -	11 11
T 952	50,000 LT. HYD.OIL		23.0		Α	HYDRO	) I	# E 4 O T 1 1	OUT FALL 003	NONE	
T 953	3,000 (EMPTY)		20.0	1.0745 1400	Α		DIKE	EARTH	NO NO	NONE	
T 954	8,500 2-DIESEL	9.5	16.0	sk2745-I488						NONE	
T 955	1,800 LT. HYD.OIL			49433	<u> </u>				NO — TO LAGOON NO " "	NONE	
⊕T 956	12,100 COAT. OIL	10.5		SHARPVILLE			CURB			NONE	
<b>⊕T 957</b>	12,100 LT. HYD.OIL	10.5		3588-3589	Α		40		110	NONE	
<b>⊕T 958</b>	12,100 GEAR OIL	10.5		33971-10078			tt .		110	NONE	· · · · · · · · · · · · · · · · · · ·
<b>⊕T</b> 959	12,100 RUST PRE O		19.0	ti ti	<u> </u>		li .		NO " "		
T 960	12,100 SOL.01L	10.5	19.0	11 17	A				NO " "	NONE	
T 961	12,100 LT.HYD.OIL	10.5	19.0	68 bi	<u> </u>				NO " "	NONE	COMPLET
T 962	4,000 RECLAIMOIL		24.0		<u>A</u>		DIKE	147484	DIRECT	BUILD DIKE -	- COMPLET
T 963	11,890 LT. HYD.OIL	8.5 x 8.5	22.0		<u> </u>		"	A	DIRECT	BUILD DIKE	n n
T 964	15,000 RECLAIM ON	_ 10.5	23.5		<u> </u>		CURB	147479	DIRECT	BUILD CURB -	COMPLET
T 965	2,000 2-DIESEL	5.3	12.0		В			-	NO	NONE	
T 966	2,000 2-DIESEL	<b>5</b> .3	12.0		В				NO	NONE	
T 967	15,000 TRAMPOIL	IO.5	24.0	∫84695	A		DIKE	89101	NO	NONE	
T 968	15,000 TRAMPOIL	10.5	24.0	(94545	Α		DIKE	89101	NO	NONE	****
T 969	10,100 LT. OIL	10.5	16.0	SHPVL.3590	A		DIKE		NO	NONE	
T 970 P	100,000 RECLAIM	25.0	30.0	36990	Α		DIKE	36990	NO	NONE (TANK EMPTY)	
T 971 P		33.0	40.0	GTX 1-3407	A		DIKE	137014,15	NO	NONE	
T 972	270 HEATING	-			Α		N.R.			NONE	
T 973	2,500 ROLLOIL	3.0	10.0		Α	CON.PICKLE			NO - TO LAGOON	NONE	
T 974	10,000 WASTE OIL	0.01	20.5	<b>7</b> 925 <b>8</b>	Α		DIKE	70056	NO	NONE	
T 975	7,500 RUSTPRE.	20.67	8.0	72353	A	OIL DRUMST	TRENCH	99349	OUTFALL OOL	CURB & TRENCH	COMPLET
<b>0 ⊤</b> 976	8,000 RUST PRE.	8.0	22.0		Α	TAN.MILL	N.R.			NONE (PORTABLE TANK)	
T 977	33,750 LT.OIL	10.5 x 13.5	30.0	70997 *	В	TAN.MILL	OIL CELL	∫70260	NO	NONE	
T 978	22,500 LT.OIL	9.5 x 14.0	22.0	70998 *	ļ. <u></u>	M 16	1) (1	73404	NO	NONE	- · · · · · · · · · · · · · · · · · · ·
T 979	14,000 MORGOIL	6.5 x 11.5	28.0	77959 *	В	11 14	10 11	72060	NO	NONE	
T 980	14,000 MORGOIL		28.0	u *	В	11 11	11 (1	10	NO	NONE	
T 981	12,000 "	6.5 x 11.0	25.0	77956*	В	Bè 11	41 td	l)	NO	NONE	
T 982	12,000	11 11	H	п	В	11 11	ł) ()	ť	NO	NONE	
T 983	7,500 CIRC.OIL	6.0 x 9.5	20.0	77962*	ļ	91 61	u u	11	NO	NONE	
T 984	3,500 LUBE OIL	0.0 x 3.0		**	В	[] []	1) /1	11	NO	NONE	
	1,000 LT. HYD OIL	4.0 x 4.6	10.0	77985 ×	8	1] (6	11 #1	11	NO	NONE	
T 985	1,000 11. 110 012	11 19	10.0	113057	8	11 12	11 14	41	NO	NONE	
<u>Т 986</u> Т 987	1,000 "	LE 14	11	18	8	" "	it ii	11	NO	NONE	
·	400 HYD OIL	3.0 x 3.0	6.0	***	В	80 10	19 (1	11	NO	NONE -	
T 988	400 NTDUIL	J,U X 3.U	3.0	<del></del>			E-12018-D			2152	
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GEN. ARRGT. DWG. M.1100 BI, B2, B3

## REPUBLIC STEEL CORPORATION - CLEVELAND SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

REV.NO. _L DATE _9/25

TANK NO.	VOL. GALS.	CONTENT	H&W or DIA. TANK	LENGTH TANK	DWG.	ABOVE - BELOW GR			TYPE CONTAIN- MENT	- <b>DWG</b> . NO.	SPILL COULD ENTER WATERWAY VIA.	CORRI	ECTIVE PL	AN OF	ACTION
T 1107	25,000	PICK. LIQ.	11.5	34.71		A			DIKE	76551	NO	NONE			
T1108	8.6	51 10	18	11.		6.5	1	onali de c	11	11	lt.	11			
T1109	1 8	18 85	10'x10'	35.0	NONE	8	Nº I	PICK.	11	162000			GEN	ADR'C'T	DWG: 659
TIIIO	18	88 88	68 80	10	20	. 68	88	88	8.8	11	80	8.6	<u>VLIV.</u>	IL IL	11 11 11 11 11 11 11 11 11 11 11 11 11
Tilli	00	88 98	10 98	68	0.0	8.6	100	to :	88	fē		<b>8</b> B	8P	00	17 60
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May 29, 1986

#### Certified Mail-Return Receipt Requested

U.S. EPA Region V Post Office Box A3587 Chicago, Illinois 60604

Attn: RCRA Activities

Ohio EPA Post Office Box 1049 Columbus, Ohio 43216-1049

Attn: Division of Solid and Hazardous Waste Management

Re: LTV Steel Company, Inc.

EPA I.D. No. OHD 004218673 & TR TSD PA

#### Gentlemen:

On January 27, 1986, LTV Steel Company, Inc. notified the agencies of the burning of a hazardous waste derived fuel (Cadence Product 312) in blast furnace(s) (industrial furnace(s)) at the above referenced facility.

This is to notify that LTV Steel Company, Inc. has officially terminated any receipt, storage and use of the hazardous waste derived fuel (Cadence Product 312) prior to May 29, 1986.

Should you have any questions, please contact the writer.

Very truly yours,

L. A. Szuhay

Manager-Solid and Hazardous Waste

Environmental Control

LAS/fh

1947a



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

111 West Jackson Blvd. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF: 5HW-TUB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. D.W. Franchot Registered Agent for Republic Steel Cleveland District 3100 East 45th Street Cleveland, Ohio 44127

Re: Compliance Order and Consent Agreement

OHD004218673

Dear Mr. Franchot:

Enclosed please find a Compliance Order which specifies this Agency's determination of certain violations by your company of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. 6901 et seq., based on information in our files about your facility located at 3100 East 45th Street, Cleveland, Ohio. The Compliance Order states the reasons for such a determination. In essence, the facility does not have a permit and has not achieved interim status under Section 3005 of RCRA, because a timely notification of hazardous waste activity under Section 3010 of RCRA was not filed with the United States Environmental Protection Agency (USEPA). This Compliance Order is issued pursuant to Section 3008 of RCRA (42 U.S.C. 6928).

Accompanying the Compliance Order is a Notice of Opportunity for Hearing. Should you desire to contest the Compliance Order, a written request for a hearing is required to be filed with the Regional Hearing Clerk within 30-days from receipt of this Compliance Order. A copy of your hearing request should be sent to Eric Dunham, Assistant Regional Counsel, 230 S. Dearborn Street, Chicago, Illinois 60604. Also enclosed is a Consent Agreement and Final Order. Should you agree to this settlement, please sign it and return it to the person named below.

The proposed settlement in this administrative action will allow you to continue to operate your facility subject to the conditions of the Final Order. The Agency believes that it will be in the public interest to allow your facility to continue to operate subject to the Order's conditions, even though your facility has failed to achieve interim status under Section 3005(e) of RCRA. Entry of this Order does not grant your facility interim status, but the Agency will refrain from further enforcement action, and the facility will be allowed to operate if the Order's conditions are complied with until a final determination is made on your permit application pursuant to 40 CFR 122. The Order does not protect against action by a third party.

If you have any questions or desire to request an informal conference, for the purpose of settlement, please contact Gale Hruska at (312) 886-6138 or at RCRA Activities, Post Office Box A3587, Chicago, Illinois 60690-3587.

Sincerely,

Basil G. Constantelos, Director / Waste Management Division

Enclosure

cc: Richard Shank, Chief

Enforcement, DHMM

Ohio Envionmental Protection Agency

David Northrop

Office of Ohio Attorney General

FJUN 2 4 1982)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. D.W. Franchot Registered Agent for Republic Steel Cleveland District 3100 East 45th Street Cleveland, Ohio 44127

Re: Compliance Order and Consent Agreement OHD004218673

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If you have any questions or desire to request an informal conference, for the purpose of settlement, please contact Gale Hruska at (312) 886-6138 or at RCRA Activities, Post Office Box A3587, Chicago, Illinois 60690-3587.

Sincerely,

Basil G. Constantelos, Director Waste Management Division

Enclosure

cc: Richard Shank, Chief Enforcement, DHMM

Ohio Envionmental Protection Agency

David Northrop Office of Ohio Attorney General

bcc: Frank Biros

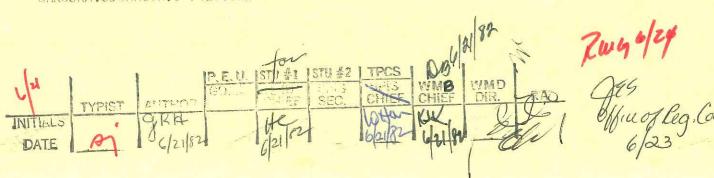
Office of Waste Programs Enforcement (WH-527)

Regional Hearing Clerk

Eric Dunham Office of Regional Counsel

TPCS Secretary

GHRUSKA: SJOHNSON: 6-7425: 5HW-TUB: 6-8-82



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF:

REPUBLIC STEEL CLEVELAND DISTRICT

3100 EAST 45TH STREET

CLEVELAND, OHIO

EPA ID NO. OHD 004218673

PREGION V

DOCKET NO. V-W-82-R
COMPLAINT

V-W-82 R-005

#### COMPLAINT

This Complaint is filed pursuant to Section 3008(a)(1) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act, (RCRA or the Act), 42 U.S.C. 6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, United States Environmental Protection Agency (hereinafter USEPA). The Respondent is Republic Steel Cleveland District.

Based upon information available to USEPA, it has been initially determined that the Respondent is in violation of certain requirements of RCRA. Specifically, Respondent has been determined to be in violation of 42 U.S.C. 6925, in that Respondent owns and operates an existing hazardous waste management facility (facility) as defined by 40 CFR 260.10, which does not have a permit or interim status. Respondent has not achieved interim status because it failed to submit a timely notification pursuant to 42 U.S.C. 6930 and as required by 42 U.S.C. 6925(e) for interim status.

#### DETERMINATIONS

1. Respondent owns and operates a facility located at 3100 East 45th Street Cleveland, Ohio. Respondent is a New Jersey corporation whose registered agent in Ohio is Mr. D.W. Franchot.

2. Section 3005 of Subtitle C of the Act provides in part, that:

"the Administrator (of the Environmental Protection Agency) shall promulgate regulations requiring each person owning or operating a facility for the treatment, storage, or disposal of hazardous waste identified or listed under this subtitle to have a permit issued pursuant to this section. (After the effective date of the regulations) the treatment, storage, or disposal of any such hazardous waste is prohibited except in accordance with such a permit." Material in parenthesis added.

- 3. Regulations requiring each person owning or operating a facility for the treatment, storage, or disposal of hazardous waste to have a permit issued pursuant to Section 3005 were promulgated by the Administrator on May 19, 1980, and are codified at 40 CFR Parts 122 and 124. The effective date of these regulations is November 19, 1980.
- 4. Section 3005(e) of the Act provides that an owner or operator of a facility shall be treated as having been issued a permit pending final administrative disposition of his/her permit application provided that: (1) the facility was in existence on November 19, 1980; (2) the requirements of Section 3010(a) of the Act concerning notification of hazardous waste activity have been complied with, and (3) application for a permit has been made. This statutory authority to operate is known as interim status. USEPA regulations implementing these provision are found at 40 CFR Part 122.
- 5. On or after November 19, 1980, Republic Steel Cleveland District has treated and stored substances, including spent pickle liquor and certain wastes exhibiting the characteristic of corrosivity which have been identified or listed as hazardous waste under Section 3001 of the Act, 40 CFR 261.31, without a permit and without having achieved interim status, in violation of Section 3005(a) of the Act. Interim status was not achieved because Republic Steel Cleveland District failed to submit a notification of hazardous waste activity by August 18, 1980, as required by Section 3010(a) of the Act. Respondent filed such a notification on August 19, 1980. A Part A permit application pursuant to 40 CFR 122.22 was filed on November 18, 1980.

- 6. Notwithstanding the violation of the requirements of Section 3005(a) of the Act by Republic Steel Cleveland District, the continued operation of the facility is determined to be in the public interest:
  - (a) for a limited period of time until a final decision on its permit application has been made by USEPA; and
  - (b) if in complete compliance with the Standards Applicable to Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities, 40 CFR Part 265; and
    - (c) if in complete compliance with the conditions set forth in this Complaint. Such operation is determined to be in the public interest because the storage and treatment of the large amounts of hazardous waste generated by the company would put a severe strain on the ability of local waste management facilities to handle such waste.

## ORDER AND CONDITIONS FOR CONTINUED OPERATION

Respondent having been initially determined to be in violation of 42 U.S.C. 6925, the following Compliance Order pursuant to 42 U.S.C. 6928(a)(1) is entered:

- A. Respondent shall, within 30-days of receipt of this Complaint, cease all treatment, storage or disposal of any hazardous waste except such storage at the facility as shall be in complete compliance with the Standards Applicable to Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities, 40 CFR Part 265; and
- B. Respondent shall fully comply with the Consolidated Permit Regulations, 40 CFR Parts 122 and 124, as if Respondent had filed a timely "Notification of Hazardous Waste Activity" pursuant to Section 3010(a), and submitted Part A of a permit application as required by those regulations.

Notwithstanding any other provision of this Order, an enforcement action could brought pursuant to Section 7003 of RCRA, or other statutory authority, should USEPA find that handling, storage, treatment, transportation or disposal of sol waste or hazardous waste at the facility presents an imminent and substantial edangerment to human health or the environment.

#### NOTICE OF OPPORTUNITY FOR HEARING

The above named Respondent is hereby notified that the above Order may become final (or a default Order entered upon motion) unless said person has requested in writing a public hearing no later than 30 days from the date this Order is served. You have the right to request a public hearing to contest any material factual allegation set forth in the Complaint or the appropriateness of any proposed compliance schedule. In the event that you wish to request a hearing, and to avoid having the Compliance Order become final without further proceedings, you must file a written answer to this Complaint with the Regional Hearing Clerk, USEPA Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within 30 days of your receipt of this notice. A copy of this answer, and any subsequent document filed in this action, should be sent to Office of Enforcement Counsel, Regional Counsel's Office at the same address, to the attention of Eric Dunham, Assistant Regional Counsel. Respondent's answer should clearly and directly admit, deny, or explain each of the factual allegations of which Respondent has any knowledge.

Said answer should contain (1) a definite statement of the facts, circumstances or arguments which constitute the grounds of defense, and (2) a concise statement of the facts which you intend to place at issue. The denial of any material fact or the raising of any affirmative defense shall be considered as a request for a hearing. A copy of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits accompanies this complaint (40 CFR Part 22, 45 Federal Register 24367 April 4, 1980; as amended by 45 Federal Register 79898 December 2, 1980). These regulations are applicable to all proceedings to this administrative action, including the filing of any answer.

#### SETTLEMENT CONFERENCE

Whether or not you request a hearing, you may confer informally, with USEPA concerning (1) whether the alleged violations, in fact, occurred as set forth above, or (2) the appropriateness of the compliance schedule.

You may request an informal settlement conference at any time by contacting this office. However, any such request will not affect the 30 day limit for responding with an answer to this Complaint, and requesting a formal hearing on the violations alleged therein. USEPA encourages all parties to pursue the possibilities of settlement through informal conferences.

Request for an informal conference may be made to Gale Hruska, at the above address, telephone number (312) 886-6138.

Signed this 21 st day of There, 1982.

Basil G. Constantelos

Birector, Waste Management Division

Complainant

U.S. Environmental Protection Agency

Region V

#### CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Complaint to be served upon the person designated below, on the date below, by causing said copy to be deposited in the U.S. Mail, First Class (certified return receipt requested, postage prepaid) at Chicago, Illinois, in an envelope addressed to:

Mr. D.W. Franchot Registered Agent for Republic Steel Cleveland District 3100 East 45th Street Cleveland, Ohio 44127

I have further caused the original of the complaint and this certificate of service to be served in the office of the Regional Hearing Clerk located in the Office of Regional Counsel, USEPA, Region V, at 230 S. Dearborn Street, Chicago, Illinois 60604, on the date below.

This is said person's last known address to the subscriber.

Dated this 25th day of June, 1982.

Waste Management Branch

**USEPA** 

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF:

REPUBLIC STEEL CLEVELAND DISTRICT 3100 EAST 45TH STREET CLEVELAND, OHIO

EPA ID NO. 0HD004218673

DOCKET No. V-W-82-R-CONSENT AGREEMENT

AND FINAL ORDER

<u>Y-W- 82 R-005</u>

A Complaint was filed pursuant to Section 3008(a)(1) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, United States Environmental Protection Agency (hereinafter USEPA). The Respondent is Republic Steel Cleveland District.

The parties to this action being desirous to settle this action enter into the following stipulations:

- 1. Respondent has been served with a copy of the Complaint (with notice of an opportunity for a hearing) on this matter; the Regional Administrator has jurisdiction over this matter, pursuant to Section 3008 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6928.
- 2. Respondent owns and operates an existing hazardous waste management facility, as defined by 40 CFR 260.10.
- 3. Respondent submitted a notification of hazardous waste activity pursuant to 42 U.S.C. 6930, on August 19, 1980.

- 4. Respondent filed a Part A permit application with USEPA for operation of a hazardous waste management facility on November 18, 1980.
- 5. Respondent neither admits nor denies any other allegation in the Complaint.

#### ORDER

Based upon the foregoing stipulations, the parties agree to the entry of the following Final Order in this matter:

- A. Respondent shall, within 30 days of receipt of this Complaint, cease all treatment, storage, or disposal of any hazardous waste except such treatment and storage at the facility as shall be in complete compliance with the Standards Applicable to Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities, 40 CFR Part 265; and
- B. Respondent shall fully comply with the Consolidated Permit Regulations, 40 CFR Parts 122 and 124, as if Respondent had filed a timely "Notification of Hazardous Waste Activity" pursuant to Section 3010(a); and submitted Part A of a permit application as required by those regulations.

Notwithstanding any other provision of this Order, an enforcement action could be brought pursuant to Section 7003 of RCRA (or other statutory authority) should the USEPA find that the handling, storage, treatment, transportation or disposal of solid waste or hazardous waste at the facility presents an imminent and substantial endangerment to human health or the environment.

		3		
Agreed to this		_ day of		_, 1982.
Respondent				.·
Title	-	:		
Agreed to, this		day of		, 1982.
Basil G. Constantel Director, Waste Man Complainant U.S. Environmental Region V	agement Divisi			
It being Agreed, it	is so ORDERED	this	day of	9
1982.	· ·			
Valdas V. Adamkus Regional Administra	tor			

÷.

### Republicsteel

Republic Steel Corporation Cleveland District 3100 East 45th Street Cleveland OH 44127

March 3, 1983

U.S. Environmental Protection Agency
Region V
RCRA Activities
P.O. Box 7861
Chicago, Illinois 60680 OH DOO42 186 73 PA, G, TR S, TSD, PAS/

Dear Sir or Madam:

Subject: SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN REVISIONS

Enclosed, please find revisions to the Republic Steel Corporation, Cleveland District's S.P.C.C. Plan involving the following sections:

General Information - Page 1 of 2 Pages 5 and 32 Appendix G

Please substitute these pages in your copy of the S.P.C.C. Plan book.

Should you require any additional information, please contact the undersigned at (216) 622-6371.

Sincerely,

S. Rihtar

Regulations Supervisor

Environmental Control Department

SR:db

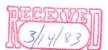
Enclosures

cc: File 0.55.0-165.00

RECEIVED

MAR 14 1983

WASTE MANAGEMENT BRANCH EPA. REGION V



### AUG 11 1982

SHE-TUE

P.N. Wiston, Vice President Steel Operations Republic Steel - Cleveland Sistrict 3105 Fast 45th Street Cleveland, Ohio 44101

Re: Republic Steel - Claveland District Consent Agreement and Final Order EPA ID No. OH DOSA212873 Docket Ro. V-V-82-9-005

Sear Mr. Wigton:

This is to acknowledge receipt of the Consent Agreement and Final Order signed by you. A fully executed copy of the Consent Agreement and Final Order is enclosed for your files.

Your cooperation in resolving this satter is appreciated. Very truly yours,

William R. Hiner, Chief Technical, Permits and Compliance Section

Enclosure

cc: Charles Wilhelm Obio Environmental Protection Agency

bcc: Hruska/Dimock, w/enclosure
K. Homer, State Implementation Officer, w/enclosure
Schulteis, w/enclosure
Regional Hearing Clerk, w/original

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF:

REPUBLIC STEEL CLEVELAND DISTRICT 3100 EAST 45TH STREET CLEVELAND, OHIO

EPA ID NO. 0HD004218673

DOCKET No. V-W-82-R-CONSENT AGREEMENT AND FINAL ORDER

<u>Y-W- 82 R-005</u>

A Complaint was filed pursuant to Section 3008(a)(1) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, United States Environmental Protection Agency (hereinafter USEPA). The Respondent is Republic Steel Cleveland District.

The parties to this action being desirous to settle this action enter into the following stipulations:

- 1. Respondent has been served with a copy of the Complaint (with notice of an opportunity for a hearing) on this matter; the Regional Administrator has jurisdiction over this matter, pursuant to Section 3008 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6928.
- 2. Respondent owns and operates an existing hazardous waste management facility, as defined by 40 CFR 260.10.
- 3. Respondent submitted a notification of hazardous waste activity pursuant to 42 U.S.C. 6930, on August 19, 1980.

- 4. Respondent filed a Part A permit application with USEPA for operation of a hazardous waste management facility on November 18, 1980.
- 5. Respondent neither admits nor denies any other allegation in the Complaint.

#### ORDER

Based upon the foregoing stipulations, the parties agree to the entry of the following Final Order in this matter:

- A. Respondent shall, within 30 days of receipt of this Complaint, cease all treatment, storage, or disposal of any hazardous waste except such treatment and storage at the facility as shall be in complete compliance with the Standards Applicable to Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities, 40 CFR Part 265; and
- B. Respondent shall fully comply with the Consolidated Permit Regulations, 40 CFR Parts 122 and 124, as if Respondent had filed a timely "Notification of Hazardous Waste Activity" pursuant to Section 3010(a); and submitted Part A of a permit application as required by those regulations.

Notwithstanding any other provision of this Order, an enforcement action could be brought pursuant to Section 7003 of RCRA (or other statutory authority) should the USEPA find that the handling, storage, treatment, transportation or disposal of solid waste or hazardous waste at the facility presents an imminent and substantial endangerment to human health or the environment.

3
Agreed to this 26th day of the 1982.
Republic Steel Corporation, owner and operator of the Republic Steel Cleveland District, Respondent
by Migton, Vice President - Steel Operations
Agreed to this 6th day of August, 1982.
Basil G. Constantelos Director, Waste Management Division Complainant U.S. Environmental Protection Agency Region V
It being Agreed, it is so ORDERED this Wfuxt day of 1982.
Nalage, danne
Valdas V. Adamkus  Regional Administrator

### III. Facility History

٨.	The	cir	cumstances surrounding the failure of the owner or operator to:
	٦.	not	ify or notify on time
_		a.	not aware that waste was hazardous
***		b.	test results came back late
-	<u></u>	C.	at first thought the waste was non-hazardous later results said it was hazardous
_		d.	could not understand regulations
-	<del></del>	e.	lost in mail
-	· 	f.	small quantity generator that lost his/her extemption due to increase in waste quantity
_		g.	did not think it was required if Part A sent in
_		h.	underwent change in ownership.
_		i.	change in regulations
=	X	j.	Other Utiknown.
•			
	-		·
-		 . k.	Comments
	2.	sub	omit Part A on time.
		a.	could not understand regulations

	4
	3. a. List of violations: <u>See inspection</u> file.
•	
•	
ę	
	b. Comments: Notification one day late
	(add additional pages if needed)
·	4. Will the facility's continued operation be a benefit to the environ- ment?
: :	a. it well help alleviate regional shortage of treatment, storage, or disposal capacity
	b. damage to the environment is negligible or non-exsistent
	c. it will not benefit the environment

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	d. ot	her,	explain		Yo+	<u>K</u> F	DWTT			Charles of		
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5.	Did th	e fac	ility_g	ain un	fair ad	vantage	over it	s compet	titors	by its i	non-	
. •	compli	ance?		<i>f</i>	1110	WIT						
/. R	ecommen	datio	ns on f	acilit	y's sta	tus: _	Ra	Ger	to			
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### Republicsteel

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Republic Steel Corporation General Offices: Republic Building **Law Department** PO Box 6778 Cleveland OH 44101

July 28, 1982

Mr. Valdas V. Adamkus
Regional Administrator
United States Environmental
Protection Agency - Region V
111 West Jackson Blvd.
Chicago, IL 60604

Re: In the matter of Republic Steel Cleveland District - Docket No. V-W-82R-005 Motion for Extension of Time

Dear Mr. Adamkus:

Enclosed please find one executed Consent Agreement and Final Order in settlement of the above matter. Because this Order does not become effective until signed by you; and, because an Answer must be filed in this matter on or before August 2, 1982, Republic Steel Corporation, owner and operator of Republic Steel Cleveland District, Respondent herein, by its undersigned representative requests an extension of time to answer or otherwise move in response to the afore-mentioned Complaint until such time as the Consent Agreement and Final Order is accepted by the proper persons in Region V. If Region V does not agree to the Consent Agreement and Final Order, Republic Steel Corporation requests an additional thirty days from the date it receives notice of such disagreement in order to allow Republic to answer or otherwise move in response to the Complaint.

Very truly yours,

J. A. McKinney, Jr. Assistant Counsel

JAMcK:lre Enclosure

cc: Basil G. Constantelos

Eric Dunham Gale Hruska

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF:

REPUBLIC STEEL CLEVELAND DISTRICT 3100 EAST 45TH STREET CLEVELAND, OHIO

EPA ID NO. OHDOO4218673

DOCKET No. V-W-82-R-CONSENT AGREEMENT AND FINAL ORDER

<u>Y-W- 82 R-005</u>

A Complaint was filed pursuant to Section 3008(a)(1) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, United States Environmental Protection Agency (hereinafter USEPA). The Respondent is Republic Steel Cleveland District.

The parties to this action being desirous to settle this action enter into the following stipulations:

- 1. Respondent has been served with a copy of the Complaint (with notice of an opportunity for a hearing) on this matter; the Regional Administrator has jurisdiction over this matter, pursuant to Section 3008 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6928.
- 2. Respondent owns and operates an existing hazardous waste management facility, as defined by 40 CFR 260.10.
- 3. Respondent submitted a notification of hazardous waste activity pursuant to 42 U.S.C. 6930, on August 19, 1980.

- 4. Respondent filed a Part A permit application with USEPA for operation of a hazardous waste management facility on November 18, 1980.
- Respondent neither admits nor denies any other allegation in the Complaint.

#### ORDER

Based upon the foregoing stipulations, the parties agree to the entry of the following Final Order in this matter:

- A. Respondent shall, within 30 days of receipt of this Complaint, cease all treatment, storage, or disposal of any hazardous waste except such treatment and storage at the facility as shall be in complete compliance with the Standards Applicable to Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities, 40 CFR Part 265; and
- B. Respondent shall fully comply with the Consolidated Permit Regulations, 40 CFR Parts 122 and 124, as if Respondent had filed a timely "Notification of Hazardous Waste Activity" pursuant to Section 3010(a); and submitted Part A of a permit application as required by those regulations.

Notwithstanding any other provision of this Order, an enforcement action could be brought pursuant to Section 7003 of RCRA (or other statutory authority) should the USEPA find that the handling, storage, treatment, transportation or disposal of solid waste or hazardous waste at the facility presents an imminent and substantial endangerment to human health or the environment.

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	Agreed to this 26th day of the	
	Agreed to this 6th day of by	_, 1982.
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	Republic Steel Corporation, owner and operator of the Rep Steel Cleveland District, Respondent	ublic
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	P. N. Wigton, Vice President -	
	Steel Operations	
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	Agreed to this 6th day of August	700-
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	Van Vata-Na	
	Basil G. Constantelos	-
	Director, Waste Management Division	
	Complainant	•
	U.S. Environmental Protection Agency	
-	Region V	4
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	It being Agreed, it is so ORDERED this Well day of	1982
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	MUWIM V. DOWNY	
	Valdas V. Adamkus	
·	Regional Administrator	

### Republicateel

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Republic Steel Corporation General Offices: Republic Building Law Department PO Box 6778 Cleveland OH 44101

July 28, 1982

Mr. Valdas V. Adamkus
Regional Administrator
United States Environmental
Protection Agency - Region V
lll West Jackson Blvd.
Chicago, IL 60604

Re: In the matter of Republic Steel Cleveland District - Docket No. V-W-82R-005 Motion for Extension of Time

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Very truly yours,

J. A. McKinney, Jr. Assistant Counsel

JAMcK:lre Enclosure

cc: Basil G. Constantelos

Eric Dunham Gale Hruska June 16, 1981

PCB Inspection - Republic Steel, Cleveland District, Cleveland, Ohio

Daniel C. Watson, Physical Scientist THRU: A.R. Winklhofer, Director, EDO

Karl Bremer, Toxic Substances Coordinator, 5AH

A PCB inspection was conducted by the author at the subject facility on April 28, 1981. At the time of the inspection the facility was in full compliance with the PCB marking, storage and handling regulations. Samples were collected and the results will be sent on a later date.

Republic Steel will be participating in a pilot program with Sun Ohio to test Sun Ohio's PCB filtration system on PCB hydraulic systems. The progress of this testing should be monitored.

Attachments

cc: Michael Mutnan, 5EWHME

## Interim Report on the Inspection to Determine Compliance with the PCB Disposal and Marking Regulations

Republic Steel Corporation Cleveland District P.O. Box 6778 Cleveland, OH 44101

April 28, 1981

Performed by

U.S. Environmental Protection Agency Surveillance and Analysis Division Eastern District Office 25089 Center Ridge Road Westlake, Ohio 44145

#### I. Company Identification

Republic Steel Corporation Cleveland District P.O. Box 6778 Cleveland, Ohio 44101 Telephone: (216) 622-5000

#### Responsible Official

Larry Aguier, Superintendent of Environmental Control (216) 622-5000

#### II. Date of Inspection

April 28, 1981

#### III. Participants

#### Republic Steel Corporation

Larry Aguier, Superintendent of Environmental Control Dale Papajcik, Solid Waste Management Engineer William Moses, SPCC/RSP/PCB Supervisor

#### U.S. EPA-EDO

Daniel C. Watson, Physical Scientist

#### IV. Objective

The purpose of this inspection was to review, observe, and document the corporation's methods of handling PCB mixtures, articles, and containers to determine if Republic Steel Corporation's Cleveland District is in compliance with PCB disposal and marking regulations (40 CFR, Part 761) published in the Federal Register on May 31, 1979.

#### V. Description of Company

Republic Steel Corporation's Cleveland District is a primary steel producing facility covering approximately two square miles.

#### VI. Inspection Summary

#### Electrical Equipment (Inventory Attached)

This facility has the following electrical equipment in service:

- 1. 151 PCB transformers containing 414,540 kilograms of PCB.
- 2. 283 large capacitors containing 2165.7 kilograms of PCB.
- 3. 11 PCB reactors containing 1861 kilograms of PCB.

A representative portion of this equipment was inspected and found to be properly labelled. No leaks were found in any of the inspected equipment.

#### Hydraulic Systems

This facility has 38 operating hydraulic systems containing 1910 gallons of PCB liquid. Most of these were inaccessable during this inspection, but a representative number of the systems were looked at. The inspected systems were tight and reasonably isolated from drains. All hydraulic systems are tested on a regular basis by Republic Steel for PCB content and the company will provide the agency with the test results if requested.

#### Storage

At the time of this inspection, the company was storing 3-55 gallon and 4-30 gallon drums of PCB liquids for disposal. This area was properly posted, isolated from non-PCB storage areas, sheltered from the weather and properly diked. (diagram attached) The diked area meets all containment volume and curbing requirements. All the stored drums were properly labelled and dated and none were leaking.

#### Recordkeeping

The company has all the required records of PCB's including an annual report. (sample attached) The records indicate the article, location, manufacturer, type of PCB liquid, capacity in-gallons and kilograms, and amount removed from service. The company also performs a periodic sampling of their hydraulic systems and keeps records of the results. (The company will supply these on request.)

#### VII. Samples

The following samples were collected:

81EW04 S01 - Tramp oil from the oil collection system.

81EW04 S02 - Hydraulic oil from a PCB system.

#### VIII. Findings and Conclusions

Republic Steel will be using a filter system, developed by Sun Ohio, on its hydraulic systems to reduce their PCB content. Since this is a pilot program, it should be monitored using Republic Steel's test results. An evaluation of this system would be useful on future inspections.

Republic Steel was in compliance with all Federal PCB regulations. Whether a problem exists at this facility will depend on the PCB analysis of the tramp oil sample.

PCB
Hydraulic Systems
Republic Steel Corporation
Cleveland District

Number of Systems	Capacity	in Gallons	Kilograms	of PCB
	Each	Total	Each	•
4 -	25	100	141.75	567.00
1	<b>5</b> 1.	51	289.17	289.17
.1	50	50	283.50	283.50
1	300	300	1701.00	1701.00
17	42	714	238.14	4048.38
7	62	434	351.54	2460.78
1	60	60	340.20	340.20
1	20	20	113.40	113.40
1	5	5	28.35	28.35
1 .	150	150	850.50	850.50
2	12	24	68.04	136.08
1	2	2	11.34	11.34
Total 38		1910		10829.70

## Republic steel

Republic Steel Corporation General Offices: Republic Building Environmental Control PO Box 6778 Cleveland OH 44101

April 29, 1981

WL West Director WB Tucker Jr. Assistant to the Director CM Brown Assistant Director—Air

Mr. Dan Watson
Physical Scientist
Toxic Substance Control Office
U.S. Environmental Protection Agency
25089 Center Ridge Road
Westlake, OH 44145

- Dear Mr. Watson:

As per your request, Republic Steel Cleveland District PCB log for 1978-1980.

Singerely,

Dale E. Papajcik

Solid Waste Management Engineer

DEP:nf

Attach.

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	SOUTH END 45 MILL MOTOR ROCK	G.E.		230	2154		C	<u> </u>	<del></del>
120	SCAKING PITS SUBSTIMION	G.E.		350	2154		0	J	<del></del>
121	SONICING PITS SUBSTRICT	G.E.		250	2154		Q ·	<del></del>	
/22	1 Suestation 125	ITE	† :	! 350	1934		0	<u> </u>	
/36	Substituen 126	TITE		350_	1934				
<u>_/37</u>	SUPCTATION 126	ITE	1	. 500	1 2834	·	0		_~÷ -
<u> 139</u>		ITE		500	2534	*	0		
139	Substation 126	G.E.	; .	230	2041		0	. 4	
140	SUBSTATION 125	11/2:		350	7934	i	1.0	<u> </u>	<del></del>
142	1 SUPSTITION 125	ITE		350	1934	,	0	<del>'</del>	
143	No.1 Recip. No.4 Field Hood Briss		<u></u>	1 134	760	1	<u> </u>	1	
/58	No I PRECIA, NO.3 FIED-NORTH BANK	KESTIL SOLICUSE		134	760	1	C		
159	No. 1 TREIP. NO. 2 FIELD-HOAM BAIN	h/emishousE		140	794	<u>o</u>	<u> </u>		
160	No.1 PRECIP. No I FIELD : NOTE (1)	< Westing out		143	811		0	_ <del> </del>	<del></del>
<u> 161 </u>	No. 2 Precip Norther Conter Ban	e 100713900076		143	3//	<u> </u>	0	<u> </u>	
162	No. 2 French No 2 Freils-Conei kn	· Idemination		143	811	1	0		
/63	No.2 Green, No.2 Felli Center	West Atiouse		100	794	<u> </u>	0		<del></del>
164	No. 2 PRESIDENCE FEED CENTER CO.	WESTINGWESTE	<b>F</b>   1	/37	777				
164	No.3 PRECEDENT TEO- LESER DE	. Westing worth		: 143 -	811		0		
166	No.3 THE CIP, NO. 4 PEUT CESER OF NO.3 FILL CIP, NO.3 FIELD & CHARLES	SESTIMATION FORES	1	143	. 3//	<u> </u>	-0		
/57	No. 2 Mec.P. No. 2 NEW-SCOUNCH	THE THE HOUSE		170	794		<u> </u>		
<u>163</u> 169	16.3 FREOR 15.1 TEXT SECTION	11/4-00000000000000000000000000000000000	<u> </u>	<i>だ</i> フ・	777	<u>.</u>	52.		<u>L</u>

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## TRAISFORMERS

						Kilogra	ams Removed	by Year.
District Code	Location	Hanufact.	Type PCB	Capacity (Gallons)	Capacity (Kilograms)	1978	1979	1980 
170	Hugo	WEST/KS/ISKISE	10006		734	<u>.</u>	0	ومطوع المجارية استقصص
173	TAR PARP YOUSE	URTO GOAFF		125	1125	利1105年	0	· · · · · · · · · · · · · · · · · · ·
179	No. 112 SUBSTATION	G.E.		1/20	6236	6 -	<u> </u>	ļ
_180	No. 1/2 SUBSTATIEN	ĢĔ.		1310	1927	<i>C</i>	0	
'31	No. 1/3 Superingers	G.C.		; 760 ·	11503	<u>:                                     </u>	0	<del></del>
'32	No. 113 Sugaremond	· G.E.	,	320	- 1927	<u> </u>	<u>!</u>	<u> </u>
89	No. 2 SUBSTATION	G.E.		401	2273	0 -	2	
190	No. 2 SUCSTATION	G.E	i	401	. 2273	· Ç	2	
215	No.4 PRECIP. No.5 FRED - SOUTH CANK	G.E.		1.3	i 667		2	
216	No.4 PRECIP. No. 4 FIETD - SouTH CASE	G.E.		//3	669	1 0	<u> </u>	
217	No. 4 PRECA? No. 3 FIE LD- SOUTH RANK	G.E,		//3	667	<u> </u>	<u> </u>	
213	Not PRECIP. No. 2 FIELD - SOUTH CANK	G.E.		//3	619	1	0	
219	No. 4 PRECIF. No. 1 Field-SouTH BANK	GE.		113	. 669	!	0	1.0 HI. VOLT. MAINT
231	No. 2 CORE PLANT PATER SUBSTATION	MESTINGHOUSE	:	503	2882	6.71	0	
234	No. 2 Care PLANT BY-FEODUCTS	G.E.	1	61	346	1 - 6	<u> </u>	
2.25	No. 2 COKE PLANT	GE.		5/	346		0 .	<u></u>
236	No.2 Coke from BY FRODUCTS	G.E.	,	460	2603	<u> </u>	0	
<i>-≥37</i>	No.2 COKE PLANT BY- FREDUCTS	G.E.		40	2603	<u> </u>	<u> </u>	
243	98 HYEROUATION	G.E.,		265	2041	<u>}</u>	0	
146	750 EXTENSION	WEET METHOUSE		172	975	<u> </u>	0	المراقعة والمستوالين والمساورة والمساورة والمساورة والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين والمستوالين وال
٣. ٤٥	16.113 SUBSTITION	WESTINGILOUSE		753	1 4269		0	
303 A	No. 126 SURSTATION	ITE .		E60	4875	1		<u> </u>
109 A	Mo. 114 SURSTATION	MESTINGUICE		75	425	C-	. 0	<u> </u>
509 B	No. 126 SUBSTATION	NE.		9:0	4875			
325	No. 1 POWERHOUSE PRECIFITATOR	GE,		110 .	624	<u> </u>	0.	
326	No. 1 POWERHOUSE TREESPITHTER	GE.		01/0	424	<u> </u>	0	
327	No. 1 POWERHOUSE PRECIPITATER	G.E.		110	624	C	0	
328	No.1 POWERHOUSE	G.E.		110	624	100		
329	No.2 Powskyouse	GE,		54	533	C	0	
330	No.2 POWERHOUSE PERCHATATOR	GE		94	5.33	0	0	
33/	No. 2 POWERHAUS RECIPITATER			, 74	533			
337	16,2 POWERPOUSE PRECEITEOR	GE.		30	5/0	1 1	0	
	94" HOTPINL KLETOR ROOM	MESTIMEHOUSE		531	. 2010		0	
<u>343</u> 344	84" Hot 1' 11 MOTOR ROCK	WESTINGHOUSE		220/200	1247		<u> </u>	
345 345	110.1 PREMIE LINE	G,E,		435	#305	<u> </u>		
<u> </u>	1710/17/CALL KING		<del> </del>					

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															-							220	3/0	357	3.56	255	352	)57	350	545	348	347	3413	アジャ	District
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		-								-		-					-			-			ユン	Mesunamouse	KESTINGHOUSE	0.E	<u>6.0</u>				N'ECTIVE COST	Wealing part	G.C.)	6.5	l'anulact.
		-									•					-							 <		-				-				1	Lewise -	Type PCB
72.15				- 34					4 6 9 9 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		_		-										<u> </u>	144	OH!	113	0:1/	1:0	134	: //3	1:41	140	2:0	502	Capacity (Gallons)
			•														*	3.		• ••		*	669	817	794	1 669	624	124	760	669	3/7	704	14.31	2846	(Kilograms)
							•••							The same as the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the sa									0	0	0	0		· ·	CAMPACION 10/2/18	THE NEW YORK	)				1978
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PCB IN SERVICE

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LARGE CAPACITORS

	-	Voltage	e: H -	High; L - Low		•			Kilog	rams Removed	by Year	، سنيا،
SF   1	Ď	istrict			Manufact.	Type FCB	Capacity (Gallons)	Capacity (Kilograms)	1978	1979	1980	<del></del>
SP 2	,		ارد	45 MILL MITE. RM. 9000 WEAT	G.E.	ASKAREL	1 6	34	<u> </u>	<u>.)</u> .	+	<u>i</u>
SP 3	•				G.E.	1	0.52	11.6	<u> </u>	0	<del> </del>	<del></del>
### ## ## ### ### ### ### ### ### ###	,		<b>\</b>				0.32				ļ	
P					G.E.		1 2.52		<u> </u>		<u> </u>	- <del></del> ,
Part			H	45 Mill 'C' SET	G, E,		282	4.5				
SP   H			\$	45" MILL D'SET	G.E.		0,81	-1.6	<del></del>	<u></u>	<del> </del>	<del></del>
SPR					G.E.	1	0.32	4.6	0		<del></del>	<del></del>
SP							c.82				<u> </u>	
SP   D	3		<del></del>	16.2 SurstA. Ale Greenere 16.1	G.5.		· c.82	<del></del>	<del> </del>			<del></del>
SPH   H   Ab 2 Substan 24 MY Als Set   GE   O.32   4/2   O O O   I	1			No. 2 SUASTA, SCARFER PUMP No. 1			. 0.52			,		<u></u>
SP12   H   No. 2 Section, Medicines of Ast   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section   Section			<del></del>		GE.		0,32	1 4.6		1	<del></del>	<u></u>
SP13   H   Mo. 2 Superty, Scale FR Rule   Mo. 2   GE     SP14   L   Superty, 15   Mo. 1 (Sup Pear)   G.E.     SP15   L   Superty, 15   Mo. 1 (Sup Pear)   G.E.     SP16   L   Superty, 15   Mo. 1 (Sup Pear)   G.E.     SP17   L   Superty   US   Mo. 1 (Sup Rule)   G.E.     SP18   L   Superty   US   Mo. 1 (Sup Rule)   G.E.     SP18   L   Superty   US   Mo. 1 (Sup Rule)   G.E.     SP18   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP19   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP20   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP21   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP22   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP23   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP24   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP24   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP25   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP26   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP27   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP28   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G.E.     SP29   L   Superty, 115   Mo. 1 (Sup Rule)   G					•		0.82	-			<del> </del>	1
SP 14				No. 2 SURGAR. SCARFER RUMP No. 2					<u> </u>		<del> </del>	<u></u>
SP 15			1		G.E,		1.5					
SP 16					G.E.		1.5	· / · · · · · · · · · · · · · · · · · ·		1	*	1
SP17   L Substa IIS No.I Cove Reat   G.E.   LS   3.5   C   O   C	1. Ny		1. (		G.E.		_ <del>,</del>		, , , , , , , , , , , , , , , , , , ,		<del>-  </del>	
SPIB   L   Suesta, 115 No.1 Cone Plant   G.E.   15   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5   0.5			1	SUBSTA. 115 No. 1 COKE PLANT	G.E.		1,5				<del>                                     </del>	
SPIA   L SUBSTA, IIS No.1 Gove RENT   S.E.   15   S.E.   1   S.E.   1   S.E.   1   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S.E.   S			17	SUBSTA. 115 NO.1 COKE PLANT	G.E.		,1					₹ <u>;</u> ;
SP 20   L   Substa, iis No. i Gove Rant   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS   S.E.   IS				SUBSTA. 115 No. 1 COLE PLANT	G.E.	<u> </u>						<del></del>
SP 21   L   Substantis Not Gove Rant   G.E.   1.5   85   C   C   C   C   C   C   C   C   C			1 6		s.E.	<u> </u>				4 12 - 4 - 4 - 4 - 4 - 4 - 4 - 4 - 4 - 4 -		
1922   L   Substant IIS Mot Come Plant   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G.E.   1.5   G					G.E.			_1,				
SP 23   L   Substantis No.1 Give Plant   G.E.   1.5   S.S   P.   O			1 7	SUBSTA. 115 No. 1 COME PLANT	G.E.			<u> </u>				<del></del>
SP 29   L SUBSTA, IIS ROL GOE FORT   G.E.   1.5   S.5   C   O	3.		1	SUBSTA. 115 No. 1 GIE PLANT	G.E.	_		<del></del>			1	
SP 25 L SUBSTA, IIS NOT COTE POINT G.E. 1.5 85 ( C C C C SP 27 L SUBSTA, IIS NOT COTE POINT G.E. 1.5 85 ( C C C C C C C C C C C C C C C C C C	1		-	SUBSTA. 115 HO. I COLE FLEST	GE.							
SP 26	, .		L	SUBSTA. 115 NOT COLE POINT	G.E.		tot frat Man As the Asia and a second page.	the first transfer to the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the second state of the		· · · · · · · · · · · · · · · · · · ·		
SP 27   L   Suesta, 115 No.1 Give Right   G.E.   1.5   3.5	٠	the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the s		SUPETA 115 No.1 Core PEANT	G.E.	_						
SP 28   L SUBSTA, 115 No.1 Cove front   G.E.   1.5   3.5			l.	SUESTA, US DO ! COVE REIN	G.E.							
SP 27   L   SURSTA, 115 1 to 1 GARE FEMALE   G.E.   15   85   0				SURTA. 115 No. 1 Cove Front	G.E.						-	1
SP 30			1	SURSTA. 115 No. 1 Care front	G.E.		}					- 6
SP 31. L SLETA, HE 15.1 GIVE RIMT G.E. 1.5 85 95 95 97 97 15 87 97 15 88 95 97 97 97 97 97 97 97 97 97 97 97 97 97	ŒŊ.		1	SUPERA, 115 1901 CONE TOHAT			· · · · · · · · · · · · · · · · · · ·			*****		
SP 30   L   CHETA, NE hail Give PANT   G.E.   15   9.5   C     SP 33   L   Cueta ne hair   G.E.   15   9.5   C     SP 34   L   Sueta ne hair   G.E.   1/ 1/5   6.5   C     SP 34   L   Sueta ne hair   G.E.   1/ 1/5   6.5   C     SP 37   L   Sueta ne hair   G.E.   1/ 1/5   6.5   C     SP 38   L   Sueta ne hair   G.E.   1/ 1/5   6.5   C     SP 39   L   Sueta ne hair   G.E.   1/ 1/5   6.5   C     SP 30   L   Sueta ne hair   G.E.   1/ 1/5   6.5     SP 30   L   Sueta ne hair   G.E.   1/ 1/5   6.5     SP 31   L   Sueta ne hair   G.E.   1/ 1/5   6.5     SP 31   L   Sueta ne hair   G.E.   1/ 1/5   6.5     SP 32   L   Sueta ne hair   G.E.   1/ 1/5   6.5     SP 31   L   Sueta ne hair   G.E.   1/ 1/5   6.5     SP 32   L   Sueta ne hair   G.E.   1/ 1/5   6.5     SP 32   L   Sueta ne hair   G.E.   1/ 1/5   6.5     SP 33   L   Sueta ne hair   G.E.   1/ 1/5   6.5     SP 34   L   Sueta ne hair   G.E.   1/ 1/5   6.5     SP 35   L   Sueta ne hair   G.E.   1/ 1/5   6.5     SP 36   L   Sueta ne hair   G.E.   1/ 1/5   6.5     SP 37   L   Sueta ne hair   G.E.   1/ 1/5     SP 37   L   Sueta ne hair   G.E.   1/ 1/5     SP 37   L   Sueta ne hair   G.E.   1/ 1/5     SP 37   L   Sueta ne hair   G.E.   1/ 1/5     SP 37   L   Sueta ne hair   G.E.   1/ 1/5     SP 37   L   Sueta ne hair   G.E.   1/ 1/5     SP 38   L   Sueta ne hair   G.E.   1/ 1/5     SP 38   L   Sueta ne hair   G.E.   1/ 1/5     SP 38   L   Sueta ne hair   G.E.   1/ 1/5     SP 38   L   Sueta ne hair   G.E.   1/ 1/5     SP 38   L   Sueta ne hair   G.E.   1/ 1/5     SP 38   L   Sueta ne hair   G.E.   1/ 1/5     SP 38   L   Sueta ne hair   G.E.   1/ 1/5     SP 38   L   Sueta ne hair   G.E.   1/ 1/5     SP 38   L   Sueta ne hair   G.E.   1/ 1/5     SP 38   L   Sueta ne hair   G.E.   1/ 1/5     SP 38   L   Sueta ne hair   G.E.   1/ 1/5     SP 38   L   Sueta ne hair   G.E.   1/ 1/5     SP 38   L   Sueta ne hair   G.E.   1/ 1/5     SP 38   L   Sueta ne hair   G.E.   1/ 1/5     SP 38   L   Sueta ne hair   G.E.   1/ 1/5     SP 38   L   Sueta ne hair   G.E.   1/ 1/5     SP 38   L   S	7		1	SLECTA, HE 15.1 COLE TRAIT	G.E.							
SP 33 L Sugar Relient Give Point G.E. 15 . 6.5				SECTA. HE Is ! (ONE PAINT	G.E.							- h
SP 34 1 Substant Size Protest Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155 Size 155	·			Sugar A. 18 1. C. Sole Pout	<u> </u>				<u> </u>			1 3
			1	SUBSTALIE No. GOL KANT	1 6,5,							
		SF 35		Signal 15 The Conte Paris	<u> </u>	<u> </u>	;.5	_11	·			ٳٞ

LARGE CAPACITORS

istrict Code	Volt.	Location	Manufact.	Type PCB	Capacity (Gallons)	Capacity (Kilograms)	1978	1979	1980	
Co 3/2	L	SugerANS No. / Come hour	G 5.	Brigery	1 35	55	0	0		<del>-</del>
SP 37	4	SUBSTRUS IN 1918 PART	G.E.		1.5	9.5	9	0		
SP 13		SUBSTALUS NO. 1 GUE HAUF	G.E.		1.5	5.5	••	0		
7° 39	L	SUBSTALES NO. 1 - 2005 POPUT	/7.E.		1.75	5.5	:	0		<del></del>
· P 40	L	SUBSTA. 115 MONIFORE PLANT	G.E.		1.5	8.5	.1	0		<u>}</u>
SP 41	L	SURSTALUS 16.1 GAE PAIT	G.E.		1.5	3.5	<u> </u>	0		<del></del>
SP 42	L	SUBSTA. 115 No. 1 COKE PERSON	G.E.		1.5	9.5	<u> </u>	O		<del></del>
SP 43		SUBSTA. 115 NO. I GHE PAIN	G.E.		1.5	9.5	*-	0		_ <u><u> </u></u>
SP 44	L.	Suzzra. 115 Holl Core Till	G.E.		15	95		0	<u> </u>	
SP45	1	SUBSTA. 115 No. 1 GLE TIEVE	GE.	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	. 7.5	9.5		) 0		
51746	L	SUBSTA. 15 No. 1 Core tient	G.E.		1.5	95	<u> </u>	0		<del></del> -
य भा	L	SUBSTA. 115 No. 1 COKE POINT	G.E.		/5	3.5		0		
TP 1/3	1	Suger A. PS Doi Care land			/,5	8.5		<u> </u>		<del></del>
5P 41	1	Superior 115 1351 2018 ROLL		l	/.5	2.5				<del>-</del>
50 50	L	Sugara. 115 No. 1 Gretant	G.E.		1.5	8.5		0		
5f 51	L	SUBSTA. 115 No.1 COKE RIST	G.E.		1 /5	2.5		Ω		_{
SP 52	L	SUBSTA. 115 No.1 COKE TUST	G.E.		1.5	5.5		0		_ <u>i</u>
5/53	,	SHEER 115 No.1 CORE POINT	G:E		/ /5 //5	8.5				₹ :
21.54	1-	SUBSTA. 45 No. 1 Coce tent	GE,	i	1 15	8.5		2		
T 55	L	Supsin. 115 No. Cost tiAnt	GE.	1	1 .5	<i>E.S.</i> 1		0	~ <del> </del>	
5° 56		SUBSTA. 115 No. 1 Care Plans	(A.S		1.5	8.5 !	ـ ن ن ن	0		<del></del>
5P 57	1 1	Support to Day 200 Years	G.E.	i	; 15	8.5	<u> </u>			<del></del> -
50° 53	1.	SUBSTA HE NO ! COKE FAM	G,E	<u> </u>	1 1.5	E.5 !	<u> </u>	0		
5P 57	L	SUBSTA HE HOLL GRE LEIT	95	1	1.5	5.5	<u>; </u>	9		
51-60		SUBSTA. 115 No. 1 COLE TONE	G.E.		1.5	List			<del></del>	
5P61		SUBSTA, 115 No. 1 Core TEAR			/.5	8.5		<u> </u>		-}-
SP62	1	SUGAR. 114 M. I GLE PLANT			1.5	3.5				-;-
SP63	L	SUBSTALLY NO. 1 CERE POINT	G.E.	i i	15	9.5				-}-
SF 134		SURSTAL HA NO. I SHE PROVI	€.E.	!	1.5	9,5	ζ	Ω		
SP 45		SUBSTALLY NO. 1 SUBTIME	G.E.		1.5	6.5		0		- -
SP 66		SUBSTA, 114 No. 1 Coxe topics			1.1.5	a.s.	· · · · · · · · · · · · · · · · · · ·	<u> </u>		
5P/7	+,~	SUBTA, THE KO, I GUE POINT			1 5	6.5				
	1	SUBSTA. 114 No. 1 COKE PENT	G.E.		1.5	· 8.5		0		
<u> </u>	+-	SUBSTALLY 12 1 2008 Firm			1.5	6.5	·····	(		
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LARGE_CAPACITORS_

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LARGE	CAPACITORS	
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District Code	Volt.	Location	Manufact.	Type PCB	Capacity (Gallons)	! Capacity ;(Kilograms)	1978	1979	1980	<del>.</del>
SP 106	41	16.2 POWERY FULLWEE-BUT	AET MEMBUSE	Harrie L	1 3		<i>C</i> .	0	1	
SP 107	-,:-/	16.15-69 SPIREY	Name of the second		1_2	{				
SP 109	,4	A FAL-BOLT	G.E.		3.52	43	<u></u>	9	ļ - <del>                                    </del>	
SF IIO	+'	13 FAN- 5.0.5	G.E.		C.52	1 4/3			<del></del>	<del>-;</del>
2 111	4	'C' FAH- B.O.F	S.E.		j <u>552</u>	1 46	<u> </u>	<u> </u>	_	-}
112	Н	D'FAIL- B.O.F.	G.E.	<u> </u>	<u> 1 0.32</u>	4.6	<u> </u>	<u> </u>	<del> </del>	<del></del>
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LARGE CAPACITIES.

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	1/	J.	T.	I	$\mathcal{H}$	H	H	H.	Н	H	H	H .	H	4: 1	11	Н	٠,١	¥	江	H	H	H	H	H	) H	H	H		H.	$\mathcal{H}$	++	H	1,1	H	$\mathcal{H}$	Volt.	3: H -
	があれている	84 Today Not Street E		AR STEED 11	W. WHEN W.	AM SVSTEN M	AIR SYSTEM W'	AN SISTER W	}	No. 2 Cow Man DELIVEN FRY Proces	AIR SYSTEM 'F"	١.	AIR STORM F	AIR SUSTER F	AM SYSTEM CT	162 Sublice FAMIN PLCKER	1	72 TERRER MILL NOTE PROM	YOUR THY JENEY	72 TENERY MILL KOTE RECM	D. This Arthur Lists Row		72 TANER MILLHOTOF ROCK	72 Trill EN Her L'STOR ROOM	72 MILEN MILL HOIDE ROOM	72 Tricker Mill Kotor Rock	72 TANSEL HEL HOTOL RAM		72 "TAIBEN MILL!" STOR ROOK	72 TANDER! L'ELL'STIC ROOM	THEREITY CL STOCK		Theen,	"TORNER BELL STOR	72 "Tarder Much otor Too"	Location	High; L - Low
	HETTING WITE	大をとれるのようという	VECEMBLY CE	Kezz.1.61/2015	Kenseroca	)をのからかご	MESIME BUSE	West, shouse	MESTINGHOUSE.	WESTING MOUSE	lifesting iouze	Messagause	MESTINGHOUSE	WESTIMB HOUSE	WestingHauce	KESTING//OUSE	رز. الازران	元のなるでは	Mestinadouse	Vesmisikuse	からいまけんで	MUSTING FOREST	HESTINSHELLSE	NESTINATIONSE	NE SIMBHOUSE	Nose chara	West, Lorence		LESTINGUOCICE	WEST THE PROJECT	MESTAGE SAK	TESTINGUISTS	וויפים מוניםיסניבל	NEST MERSONSE	RESTANDANCE	Manufact.	
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#### LARGE CAPACITIES .....

	Voltage	e: H -	High; L - Los	en ) halo consumers				Kilog	grams Pemoved	by Year	
Τ	District Code	Volt,	Location	Manufact.	Type FCB	Capacity (Gallons)	Capacity (Kilograms)	1978	1979	1980	
	Sh 36		34" THREM MILL SYSTEM E	KECTIMOMOLICE	HSKAREL	1 /	5.7		. 0	1	<del></del>
`	Sn 37	Н		KEDINSTOUTE		/	5:7		0	<u> </u>	<del></del>
_	SN:39	<i>H</i>	84 TARREM PLL SYSTEM D	NECTIVE HOUSE		ļ· / .	5.7	,	0		<del></del> ; ,
•	5) 40	H	84 TANKEY L'YL SYSTEM D	NECT/MEMORIE		1	5.7			<del>-</del>	<del>}</del>
	m41	H	BY" TANDEN L'EL SYSTEN D	KEOWITTOWE		1	5.7		0		<u>}</u>
	42	Н	84" TANDEN MILL SYSTEM A	WESTINGHOUSE		1 /	5.7				<del>'</del>
	Vn 43	H	BY TAULEM L'EL SYSTEM A	MESTINGHOUSE		! /	5,7		2	ļ	1
	SN 44	Н		WESTINGHOUSE		1 /	5.7		c).	<b></b>	<del>}</del>
.)	5/145	H	84" TANTEM! YOU SYCTEM B	KESTAVALLOUGE		<u> </u>	5.7		0		<del>: -</del> -
T	SM 46	H	84" TAIDEM MILL CYCTEM A	WESTINGHOUSE	``[	<u> </u>	5.7	· ·	0		موسيت
	SM 47	H	BY TANGEN MILL SYSTEM B	WESTMAHOUTE		1	5.7	<u> </u>	0		·
	SM 48	H	SU TAINEN MILL SYSTEM B	WESTINGHOUSE		1 1	5.7	<u> </u>	<u> </u>	<del></del>	1
	SM 49	+	RY TEDBEN MILL SYSTEM 3	VESTIFETIBUSE		1	5.7		0 .		<del></del>
	SM 50	H	84 TANDER MILL SISTER ?	Nesumenouse		<u> </u>	5.7		2	<del> </del>	<del>                                     </del>
•	SM 21	H	84" TEMEN HEL SYSTEM C	KESTILKHOUSE			57	·*	()		<del>}</del> ;
٠٠,	SM 52	14	84" TANDEM MILL SYSTEM C	MESTINGHIOUGE		1 /	5.7	<u> </u>			<del>                                     </del>
	SW 23	H	84" TAVIEN MILL SYSTEM C	WESTINGHOUSE		1/	5.7		<u> </u>	-	<del>}</del>
	SM 54	ļ ļļ	BY TAIDEN MILL SYSTEM C	MESTINGHOUSE		1	5.7		, 0		÷
	SW 22	H	ZINCLINE MOTOR TOWN	AAF	<u> </u>	1 2	1/-3		0		<del></del> -
	711 56	H	ZINCLINE MOTOR ROOM	AAF		1 2	1.3	· <del></del>	0	-	
	SV.57	1-11	ZING LINE MOTOR ROBY	AAF -		2	4.3	<u></u>		<del> </del>	<u></u>
	<u> </u>	H	ZINC LINE MOTER ROOM	<i>P.AF</i>		1 2	//.3		<u> </u>		<del>-</del> :
3	SM 59	; H	ZINC LINE ADTOR ROCK	AAF		2	//.3		0	1	1
2	51160	Н	ZING LINE ! STOR ROOM SINCE!		<u> </u>	2	11,3		0		†- }
	SM 41	H .	75 HALLIEN STEAKS NOTER ROOM	AAF		THE TANKS THE PROPERTY.	5.7		2	<del></del>	1
	5462	H	1/2" LINE MOTOR ROOM	VESTINGHOUSE			5.7			<del></del>	<del>                                     </del>
	ZW 63	H	1/2" LINE MOTOR ROOM	WESTINGHOUSE	!		5.7	· · · · · · · · · · · · · · · · · · ·	5	-	1-
	SA1 64	H.	1/2" LINE MOTOR ROCK	WESTINGHOUSE		<u>                                     </u>	5.7	<u> </u>	0	<del> </del>	<del> </del>
	S.M 65	H	15' LINE MOTOR ROOM	WESTMEHOUSE	1 .	<u> </u>	5.7		)	-	1
3	SH1 66	H	80 TEMER MULLIOTS: ROSA	WESTILGISE		<del>                                     </del>	5.7			1	1
الحق	SM 67	14	30 Tenses Min North Rock	KEET KEHOUSE	- !	<u> </u>	<7		ý A	-	
	51168	14.	98" Hor Min Horas Rock	WEST PRISME		<u> </u>	5.7	<u> </u>	-\ <del></del>		
	SM 69 "	H	78 Hor / EL Moraz ? 2001	VERTING-00CE		<u> </u>	. 5.7				
	SM 70	H	93" For / ac Norse Real	WESTINGHOUSE	<del></del>	1	5.7		<del> </del>		<del> </del>
	SM 71		1877年在上月10日至601	VET HOUSE	) <u>v</u>	<u> </u>	5.7			<u> </u>	

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LARGE CAPACITORS.....

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*		SA JA	Pol MS	SM 103	SM 102	SM 101	OOI WS	52 53	SN 93	S 7 97	24.46	SM 95	th WS	SM 93	SM 92	16 VVS	SW 90	(39 YZ)	SM 83	SM 87		SN SS		SM 83	,		- 1		- 1		SM 76	57, 75	Ma 74 IST UZO	S:11 73	SM 72	District Code	Voltage:	
	1	I		I	H	I	I	H	H	H	$\mathcal{H}$	I	I	E	12	7"	X	I	I	I	H	H	7:	H	#	#	h,	H	I	$\mathcal{H}$	7.	7		H	#/	Volt.	e: H -	
	76 11 - 17 P. 15x	-	CYTHE Now Y.R. North STARS CT	SHIRT MELL NR. NORTH SHAREY	SY POT MILL M.R. MORTH STRACEY	The Mar HE METH STANCY	93" Cow The MOTOR RIVER STANGET	73" (218 1/14 Hora Rock Stricky	28 Cord Mice Morse Rose Sharey	93' Beid Aluch STEE BOM STANZEY	B'Est Hout Room Soll	fue,	3 Cow Mile Portor Roy STANCE	38 (Let May Hotal Ben Street)	98.72.3 Miss " state Book Styn 384	90 Chb Hun Moras Rove SHILEY	PRICED MAL "ONCH ROOM SMEET	98" Lib Min Herer Poon STDILY	78" 628 Mer Moral Room STARY	78" G. S. P. H. L. L. SEEL PROM. SILVARY	98" Cots 1/114 110002 Rock SHINEY	03" to & Mru Mose Bon Snice	B Colling Korok Bon STANEY	98 Cas Mary Grai Rock Striet	~ 1	93 Ges Mue Porce Ross Tracey	78"Ce Muc Morel Read SHIRY	78 Cars Mile Worse Roon Starger	500/	8	13 60 May 165 2 500	PB (SIDAPIL MOTER ROCKSTARY)		35	98"/box///26//sock Rown	Location	High; L - Low S - Since	The same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the sa
	Mesminance	大学できませばら	West wanters	Mechanicate	KESTAGHOOSE	1	G.E.					GE,		G.E.	GE.	GE.	G.E.	0.E	G.E.	J.E.	GE,	G,E.	G.E.	G E.	3.5	GE,	G.E.	4.E.	ů. G. H.	GE.	G.E.	1657, NEHOUSE		WESTING-MONTE	KETTH - 513075	Manufact.	(n (n	
	1												-																			, , , , , , , , , , , , , , , , , , , ,		-	135105151	Type FCB		Tracking Carachitecture
- <del>L</del>	. \	/			*		1,4	1,1	1.1	1,4	£7,	1,14	1.4	14		1.4	11.4	1.4	1.4	1.4	114	1.4	1.4	hil	1.4		14	1.4	1.4	1.4	1.4	2.0				(Callons)		() かんというしょ
	5.7	5.7	. 57	5./	0,	7,0	- 7	1.7	6.7	10		(,7	1 1	7.7	7,9.	7.7	7.9	7.1	7.9	7.4	79	7.7	7.9	7.9	7.9	7.9	7.4	7.9	7.9	7.9	7.9	13	***************************************	4.7	5.7	(Kilograms)		
						ţ	1	. (	, ()	,,	() ()	, (v)	, [·,		0	0	,	. 53		3		0	0		C			(,	O	0		0		ن	0	197.8	Kilog	:
		۱ از	٦ (١	· /		-			3 (	3	٠,٠	١		ò	<b>3</b>		١			3		. 0	(3)	7	0	53	0	2	0	0	2					1979	Kilograms Removed	
		-														A CONTRACTOR OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF TH		<i>i</i> ,				-														1980	bу	

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TARGE	CAPACITORS	
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	Voltage	e: H	High; L - Low S-Sund	ماهمین . بهستنست میر				Kilog	grams Removed	by Year
ì	District Code	Volt.		Manufact.	Type PCB	Capacity (Gallons)	Capacity (Kilograms)	1978	1979	1980
	·SXI 107		BY"Hat Mac M.A. Hacter Strates	Westmanduse	ASKAREL	1 /	5.7	**.	0	
•	Sch 103	Н	84 Hor 11 m M.R. 1207 . 1900	KERMAKEUTE		/	5.7	C .	0	
.,	SM 109	Н	St Hot Mac MR Scott STONEY			1	5.7	<u> </u>	0	
	SM 110	Н	ENTHOR MILL MIR, SOUTH STAINT			: 1	5.7	<u> </u>		
	SM III	Н	SY HOT MILL K.R. SOUTH STINEY		<u> </u>	<u> </u>	5.7		<u> </u>	
	5:1112	H	84 Hor Now MR SOUR STARLEY	WEST, MERIONICE		<u>: 1</u>	5.7	<u> </u>	1_0	<del> </del>
	SM 113	Н	84"Hor Mice M.P. Sewir STANGEY			1 /	5.7	С	0	
	SM 114	Н	St Hor KILL MR. SOUTH STARE	Weshing buse		1	5.7	<u> </u>	0	
	SM 115	H.	84"Hot HILL M.R. Surry STEWEY			1	5.7		0	
. 35	SM 116	H	34" Hor Mile M.R. South Strades	MESTIMOHOUSE	1	1./-	5.7		10	
	SM 117	H-2	84" Hor MILL M.R VSB	G.E.		1.4	7.9	<u> </u>	0	
	SU 118	H-S	84"Hor Mac M.RRI	G.E.	<u> </u>	1.4	7.9	<u>:</u>	0	*
	SX1119	H-S	84 Hot / ML M.RRZ	G.E.		1.4	7.9	1 70	0	
	S.M120	H-S	84 Horiline M.RR3	G.E.	<u> </u>	1 :4	7.9	<u> </u>	0	
	SNIZI	H-S	84" HOT KILL M.R. PY	G.E.		1.4	7.9		0	
*	SM 122	14.5	34" Hot Mu MR-R6	G.€,		1.4	7.9	<u>; ;                                   </u>	0	
	SA1123	H-S	54" Hor Mill N.P No. 1 Desires	$\in \mathcal{E}$		1.4	7.9		2	
	SM 124	11.5	84"HOT MILL M.R NO 2 DESCRIE			1,4	7.9		2	*
	SM 125	11.5	84 Hor Mrs. M. R. Mess Legent	<u> </u>	<u> </u>	1 -1.4	7.9		0	<del> </del>
	S/1 126	H.S	SY"HOT MILL ALR: NO. 4 DESCALE	G.E.	<u> </u>	1,4	7.9	<del>_</del>	AND DESCRIPTION OF PERSONS ASSESSMENT	The same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the same and the s
	5/1/27	H-5	QUE HOT MILL 11.2.715.5 DESTILE	G.E. "		1.4.	7.9	<del></del>	0	
	SM123	H-5	34 HAM. N.R Vo. 1 Kr. N. GUENCHON FACE	G.E.	<u> </u>	1.1.1	7.9		0	1
5.50	SM 129	1 11.5	34"HKULR-162 /ANGVECTONES	√ <u>G.E.</u>	<u> </u>	1.4	79		0 0	
	SM 130	H-5	GY"HAMACR-163 MANGECTURE TE			1.1	7.7		()	
	SM 131	HS	BY HALAIR- FOUR EN MOST FAN	GE.	ļļ	1.4	7.9	en Per en seka en nombrosendada Sen		
	SM 132	4.5	SY HAUIL R- No I Rou Como love		<u> </u>	1.4	7.9		0	
	·S(1/33	H·S	SY HALLR - No. 2 Rear Come Pour			1.4	7.9		· · · · · · · · · · · · · · · · · · ·	
	SM 134	1.5	SY HILLIE MA 3 Par Counter Punt	G.E.		1.4	7.7		0	
	SM 135	H-5	84 HAMMER No. 4 Ren Comme Port	G.E.	ļ	1.4	7.9		0	
(8)	SM 136	#-3	BUTHULLE, - 15,1 ROLL GLEEK POUR	G.E.			7.9			
	54 137	H-5	SY HILLI 2-No. 2 ROLLEGER PERP			1.4	7,9		2	
	S& 133	H.S.	STHULL Rolls : Par Guertion	G.E.		1,4	7.7		0	-
	S.1 131	H-S	SYHMUF, KOLAR GUNSSEL	G.E.		1.4	7.9	·	<u></u>	<del>                                     </del>
	SH 113	H-5	34 MAREL-162 HR CONTRECTOR	<u> </u>		1.4	7.F 7.F		1 3	
	SM 141	-5	EXCENTION SITERING SET	G.E.	1 4	1.4	<u></u>			

FAGE _ 7

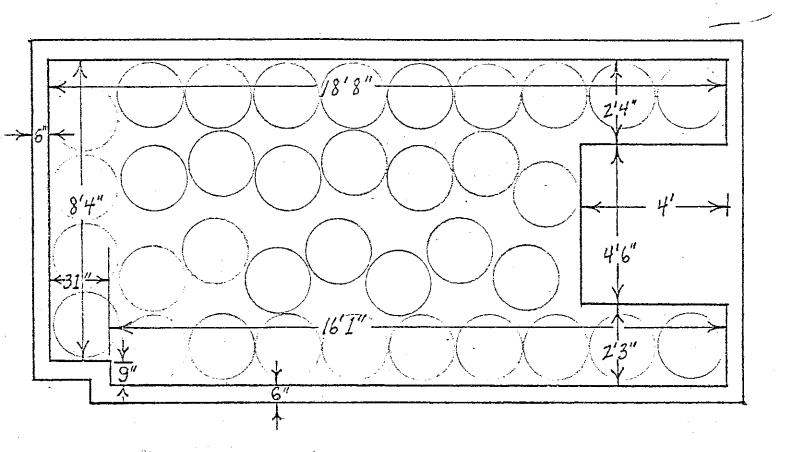
LAFGE CAPACITORS

Voltag	e: H -	High; L - Low		- Therath Car	, A her 4 per 1.50 mm = 1.5	• • • •	Kilo	grams Removed	l by Year	
District Code	Volt.	Location	Manufact.	Type PCB	Capacity (Gallons)	Capacity (Kilograms)	1978	1979	1980	
SA 142	H.S	Start I've Taken I've 1652	G.E,	ASIGNEL	:4	7.7	)	O		
5H 143	H-S	31 Josh Line Procest Enrilles Ser	G,E		1.4	7.7	)	0		
SM 144	H-S	SY 3.5/ML PERCEREMENTES	GE.		1.4	7.5	ЭС	0		
SN 145	H-5	St Con the No I mount on No Ser	G.E.		: 1.4	7.9	<u> </u>	0 -		,
SM 186	11.5	SYCOID NEL NO. 2 Traver Mer NGSET	G.5.		1.4	7.9	2	0		
SM 147	14.5	98" NMMIR. NO. 1 M MG SET	G.E.		; 2	11.3	0	0		
SM 148	H-S	93 H.Y.H.R. No 211 83 557	G.E.		2	11.3	Ō	0		
SM 149	11-5	98 H.M.M.R. N.S. 3M N'S SET	G.E.		2	//3	)	0		
SM 150	H-S	93"HALLIR. ROUGHING SIZE BREAKER	G.E.		2	1/3	)	0		
SM 151	H-S	93 H.M.M.R. No. 2 Poccarito Mice	G.E.		1 . 2	//3	,	j		
SM 152	14.5	98 HAMP. No. 3 POURANT NICL	G.E.		2	11.3	<u> </u>	0		
SM 153	H-S	98 HMILR, No.4 ROUSHING MILL	GE.		2	11.3	<u> </u>	0		
SM 154	H-5.	93" HALLR. RETARY GROP STEARS	. G.E.		1	5,7	· )	0.	1	
SM 155	H·S	93 HALKE CENERAGSET	S.E.		, ,	5.7		0		
SM 156	H-S	78 Cow MILL GAITLEX-16, EM MISSET	G.E.		2	1/3	<u>5</u>	1 9		
SI 157	H-S	18 Con Muc Sourcex 15 411 16 SET	G.E.		2	11.3	,	0		
SM 158	H.S	98"CALC, No. 3 PROMER N. A. 3.7	G.€.		2	//-3		0	i i	
SM 159	11.5	98"CAC, SY FAME MulliG. SET	G,E,		.2	// 3	. 5/	<u>}.</u>	) 5	
SM 160	.÷∙S	98 CMC No. 2 PICKED FRAY SEET	G,E.	<u> </u>	! 2	11.3	~	0	1	
521 161	4-2	BINC 16.2 Perces DEWELMISSET	GE.		2	11.3	• • • • • • • • • • • • • • • • • • • •	Company = Prince	-	ميد موس
SM 162	H-5	72" TANDEM MILL NO.1 MG SET	G.E.		2	1/3-			;	
SM 163	H-S	72" TANZEN MAL NO.2 HG SET	G.E.		2	113	25	<u>:)</u>	<u> </u>	
SW 164	1 #-5	84 HOT MILL NO. 1 KHEEER HOT PURP	GE.		1.7.7	7.9	0			
SH 145	H-S_	St HOT Mac No. 2 WHEELER NOT POUP	G.E		1.4	7.9	<u> </u>			~ . n= +
SM 166	H-Z	34 Ha Mice No. 3 VHEELER HUR PORF	GE,		1.4	7,9	0	0		
SM 167	H-S	BY HOT MALL NO. Y HUTELEPHOTRUP	G.C,		1.4	7.5		0		
SM 163	H-S	98 Hot Mullow Rose No. 5 STERE.	GE,		2	11.3	<u> </u>	0		
SM 169	2-14	98 HOT MILL MOTER ROOM NO. 4 STEE	G.€,			5.7	0	<u> </u>	<u> </u>	
SM 170	H-S	93 Cas Mac No. 1 Proviet 5, AN MG Set	GE.		7	5.7	೨	C.		
) SH 171	H-S	78 Castles No. 1 Perces Prime N'S. Cet	GE.		/	5.7	. ^	/)		
SM 172	H-S	75" MALDEN SHEART 15 SET	Ğ, <b>€</b> ,	<u> </u>	. /	5.7	<u> </u>	)	-	<del></del> -
SM 173	4.5	30" TEMPER HOL MG SET	<u>G5.</u>		1	5.7		<u> </u>	<del> </del>	
	ļ								<del> </del>	
	<b></b>							<u> </u>	<del> </del>	
	<u> </u>	<u> </u>	<u> </u>	<u> </u>	L	<u> </u>		1	·	

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						tra m	grans Removed l	ov Year	
District Code	Location	Manufact.	Type PCB	Caracity (Gallons)	Capacity (Xilograms)	1978	1979	1980	
SM I	98 HAUR B. Hore M. & SET STREET ROOM	G,E,	ASCAREL	23	130	Ü	O .	: :	
SM 2	9371182.16.1 Aug. NESET SAREKS RELOTE	G.E.	1	23	/30	Э	0		
SM 3	98CHIR 16.1 NG SET STIETING PENTIL	GE,		35	118	٥	41.0 REC STORE		
5/114	78"0.1116"R. No.3 /15 ErSmit Person	G.E.		35	173	<u>ئ</u>	410 RSC STORE		
SM 5	198"HULLR, No. 2 DESCRE STATER PEROCK	$G, \mathcal{E}$ ,	<u> </u>	17	103	ن	0		
SM 6	98 HAWR, No. 2 DESCHIE STARTER REACTOR	G.E,		<u> </u>	/08	<u>ت</u>	0		- <del>_</del>
SM 7	78 HAMB. P. No. I DESCALE SWITER REACTOR	GE.		19	/08	Ü	0:-		<u> </u>
5/18	98 H.V. A. J. A. S. Man A S. S. STATE RENOOR	Ģ.E.	1	23.5	2/8	0	0		
SM 9	178 HIMR 16.2 HAWALE SET STREET PEACOR	G.E.		35.5	1 213		0		<u>.</u>
SM 10	18/11/19 No. 1/1/10 1/5 SET STARTER REACTOR	C.E.	·	35.5	2/8		0		بمد <del>ت</del> 1
SMII	198"CHAR NO. 4 MG SET STARTING PENCTOR	KESTINGHOUSE		40	227	D	21.0 REL STORE		<u>,</u>
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~~~;***************************	Mr. Mr. M. Sand Community and Sand Sand Sand Sand Sand Sand Sand			A COLO CIMENTA AND AND AND AND AND AND AND AND AND AN				<u>.</u>	
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									<u>L</u> .

P.C.B. STORAGE FOR DISPOSAL SIGHT

LOCATION: REPUBLIC STEEL CORP. - CLEVELAND DISTRICT HUGO STORAGE BLDG.



TOTAL INSIDE CONTAINMENT VOLUME: 559.64 GALS.

TOTAL INSIDE AREA: 149.60 SQ.FT. (21,545 SQ.IN.)

LEGAL CONTAINMENT UDLUME: ZZ38.56 GALS.

TOTAL DUMBER 55 GAL. DRUMS: 40.7 DRUMS (PER VOLUME)

TOTAL DUMBER DRUM STORAGE: 36 DRUMS (ACTUAL SPACE)

TOTAL STORAGE VOLUME: 1980 GALS.



U.S. ENVIRONMENTAL PROTECTION AGENCY

SS (EF. (exional Office)

Region V, 230 So. Dearborn St. Chicago, Illinois

NOTICE OF INSPECTION

At head the	4/20/01 10 20 P.M.
NAME OF INDIVIDUAL	TITLE SUPERINTENDENT OF
LARRY AGNICE	FIRM ADDRESS (Number, Street, City, State and Zip Code)
FIRM NAME REPUBLIC STEEL CLARBARITION	FIRM ADDRESS (ITSMOSE, STREET, CLY, STATESTO ST
CLEUCERNO DISTART	CITED TO TO COMPO
SIGNATURE OF EPA EMPLOYEE	THE PHYSICHE SCIENTIST.
- CARON FOR INSPECTION:	

For the purpose of inspecting (including taking samples, photographs, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures or articles within or associated with such premises have been complied with.

For the purpose of inspecting (including taking samples, photographs and other inspection activities) a conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their disbribution in commerce (including records, files, papers, processes, controls and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures or articles within or associated with the conveyance have been complied with.

In addition, this inspection extends to (circle appropriate letters):

- A) Financial data
- Sales data
- C) Pricing_data
- Personnel data
- E) Research data

The nature and extent of inspection of such data specified in A through E above is as follows:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY. REGION V

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60504

Facility Inspected: Republic STEEL Name of Person at the facility CORPORATION

ELEVELAND DISTRICT Date(s) Inspected:

to Whom this notice given:

LARRY A CUIF SUPERINT ENDENT

. ENVIRONM ENTAL CUNTROL

Title

Name of Chief Officer of business:

Date mailed to Chief Officer:

Name of EPA Inspector: DANIEL C. WATSON

Address:

25089 CENTER RIDGE RD.

WESTLAKE, OHIO 44,45

It is possible that EPA will receive public requests for release of the information obtained by inspectors during inspection of the facility indicated above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552, EPA regulations issued thereunder, 40 CFR Part 2, and the Toxic Substances Control Act Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the agency determines that the data contains information entitled to confidential treatment.

In order to facilitate the Agency's timely response to any public inquiries, while giving due consideration to your company's right to request confidentiality, please provide us with a statement specifying any information which our inspection of the above indicated facility may reveal which you believe should be entitled to confidential treatment.

Your statement should be addressed to Mr. Paul Meriage, Toxic Substances Office, address above and should reach this address no later than 30 days after receipt of this notice. Failure by your firm to submit; within the 30 day time period, a written request that information be characterized as confidential or privileged. will be treated by EPA as a waiver by your company of any claims for confidentiality regarding the inspection data and the data will be made available to the public without further notice to you.

Signature of Plant Manager or Chief Officer of Business



I ONLY STATES IF O MENTAL PROTECTION AGENCY REGION V

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

RECEIPT FOR SAMPLES AND DOCUMENTS DATE Name of Indidivual . Address (Street, City, State, - Zip Code) REPUBLIC STEEL CORPORATION. CLCVCLAND DISTRICT CLEVELAND, OHIO Sample Number(s) 816203 Samoles Collected (Describe fully, List source, location, and other positive identification) The following samples and documents were collected by the U.S. Environmental Protection Agency and receipt is hereby acknowledged pursuant to Section 11 of the Toxic Substances Control Act (TSCA, 15 USC 2601 et seq.). 81EW04 SOI WASTE OIL SUMP 8/EW04302 HY DRAJUC.
System .co. BATTCOY # TSTOCK ACKNOWLEDGEMENT OF COMPANY - The undersigned acknowledges that the samples and documents shown above were obtained from the sources indicated. Title (Owner, Operator, or Agent) -Signiture (Owner, Operator, or Agent) SPECKTOPES JULY.

Title of Collector

Duplicate Samples Not Requests

Signature of Collector

Duplicate samples requested and provided

Hame of Collector (Print or Type)

in les ation

OCE COMPLIANCE INSPECTION REPORT

PROTETTY SIRMARY	
SECTION A. FACILITY SUMMARY	le)
SECTION A. FACILITY Scored Name and address of facility (include county, state, and zip coo	
REPUBLIC STEEL CORPORATION	
CLEVELAND DISTRICT	
·	
CLEVELAND , OHIO	
rible official Title (2/6)	•
d to Contract	
harry himself is call bathe marginal 122-500	o.
Dale Pappile Egine Phone	
Facility Representative $\frac{1}{SPCC/RSD/PCR}$ (216) 622	-5000
William Misso	
SECTION B. INSPECTION/REVIEW	Date
Agency Signatures	april 28,1981
$0 : (0,1) + U.S. \in PH$	april 25,1101
Inspected by Named (Water	
Inspected by	
Reviewed by	
SECTION C. INVENTORY	for fitting
SECTION C. INVENTORY 1. As of July 2, 1978, did facility contain in service, stored 1. As of July 2, 1978 did facility contain in service, stored 1. As of July 2, 1978 did facility contain in service, stored 1. As of July 2, 1978 did facility contain in service, stored 1. As of July 2, 1978 did facility contain in service, stored 1. As of July 2, 1978 did facility contain in service and service are stored.	
1. As of July 2, 1970, disposal: use, or stored for disposal: use, or stored for disposal:	
use, or stored for dark voltage capacitors? a. 50 or more large high or low voltage capacitors? NA^*	C/&^^
	C/A
h ler mere PG transforment.	
c. 45 kgs (99.4 lbs) or more PCB chemical or to mixtures? VES_NO_X_N/A_	C/A
c. 45 kgs (99.1 lbs) of .DD ves NO A N/A substances or PCB mixtures? VES NO A N/A	
*Not applicable	
**Comments attached	

2. D	es the	e faci	ility usa	large cag	pacitors?				
			4			YES X NO	N/A	C/A	
	(If	yes,	character	ize belo	- -)	, 	· · · · · · · · · · · · · · · · · · ·		
	a.	Larg	e High Vol	Ltage			,		
		2)	PCB capaci List numb	itors er, size,	rge high v location, itors/belo	and type		93	
<u>%.</u>	Size	<u>Type</u>	Kg PCBs Each	Area Loczted	No. Properly Marked	No. in Service	Stored	No. Stored for Dispose	<u>-1</u>
	1/1/10	NTO	RY AT	TACHED					
			<u> </u>						
				<u> </u>					ن بب
	·	3)	Total nu capacito	mber of la	arge, high	voltage (non-PC3	<u> </u>	
, , ,	Ъ.	Iar	ge Low Vo	ltage		•	•		
		1)	Total nu PCB capa	mber of l citors	arge, low	voltage —	90		
		2)	List num capacito		, කත් ප්රථි	of large	lew volt	aça	٠.
<u> </u>			<u>e Each</u>	_ <u>locate</u>		No. y in Servic	Stored	No. Stored for Disc	osal
·		NVEN	ITORY	ATTAC	HED.	<u>·</u>	<u> </u>		
					<u> </u>	<u> </u>			
	<u> </u>								

Systems, compressors), or concerners of res of results of $\frac{1}{2}$ NO N/A (in other PCBs, PCB equipment (e.g.	INVENTORY ATTACHED	Rg/Gal of PCEs or No. No. No. No. No. No. No. No. No. No.	3. Does the facility use or store PCB transformers? (If yes, characterize below) YES \times NO N/A	3) Total number of other non-PCB capacitors	No. Size Type Each Area (s) Service for Use for Dist	List of other o	1) The all number of other capacitors with PCBs /5/
/A C/A	e.g., eat transfer			1/a C/A		or Disposal		157

Other Capacitors

Total number of large, capacitors

÷	(If yes, characte	erize below)			
lten	Kg PCB/ Gal. Liquid Size	No. Properly Marked	No. in Service	No. Stored for Use	No. Stored for Disposal
	INVENT	ORY ATT	ACHED !	FOR RE	ACTORS
•	TABLE	: О <u>ғ. МҮО</u> РАО	LIC SYSTE!	ns <u>ATTAC</u> H	νε <u>ο</u>
					
5.	Based on the above chemical substant disposal at this	tes or alta uni	what is the course in sa	estimated rvice or st	amount of PCB ored for
	In Service	429,	396.40	(kgs)	
	In Storage for U	se <u> </u>	0	(kgs)	c sseed.
	In Storage for D	-	-		5-55gef.
	Total		012.35		
	Were there obsert disposal of FCS (If yes, cocure	substances or it and sample.	,) YE	is no $\overline{\times}$	N/AC/A
7.	Was there any in contaminated by (If yes, docume	soulls, leak	s, or muficily	er uragnam	nity have been ? N/AC/A
3	. Were samples co	llect≋i for ≥	. -		· .
	the state of the s				•

STORAGE AND EANDLEING

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EDE-non	ieve a
3 storage site:	/ have a storage si
SHI	SITE
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	SEDG
	that is dis-
	tn
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FEFFE the boundary of ð the facility,

ά,

If the stora

site's

- Physical redirector 8 sites where PCBs H H H stored:
- Provide protection Hea rainfall? ON X SEE
- Ō, Kinda'i 8 [1] requirements with 6-inch YES X Ö ×,
- Meet containment volume requirements? No E/N

What is storace Sito. total (Fight contairment volume of (width x length x height)? 559,64 148,60 Ft2 OX

- What is the container he internal mal volume within? D D the largest ig G articia
- What is the within the s e total internal storage site? wolume of all containers
- iten Greater than 2 285ga

1ten 3)

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XX XX

		đ.	Is the area within the curbed area expansion joints, or other openings	void of drains, valves,
				YES X NO N/A C/A
			(If no, document location of opening ultimate disposal location in log b	ng, črzinage path, and mok.)
		e.	Is storage site located above the lelevation level?	100 year flood water YES Y NO N/A C/A
•		f.	Are storage areas adequately marked	32 ATRICA
	3.	Cor	ntainers:	
		a.	Are all PCB storage containers which storage areas marked and dated?	ch are located within YES X NO N/A C/A
		þ.	Do PCB containers comply with DCT	
				YES X NO N/A C/A
	4.	St	orage Site Operations:	
		ء 5	. Do observations indicate good hous	seksebiud brocegnies;
		•	. Are PC3 storage containers marked	VES X NO N/A C/A
		þ.	located by date?	YES X NO N/A C/A
		, c.	. Is moveable equipment decontamina	ted på spokoned brokedniss;
	٠.			YES
		đ	. Are PCB containers stored and han them from accidental breakage or o	dled in a manner that protects damage?
-				YES X NO N/A C/A
	5	. 0	ther Storage Araas:	
		a	. Are any non-leaking PCB articles outside prescribed storage area?	being scored VES NO X N/A C/A
			Have they been there for fewer th	,
				ves no n/a / c/a

				YES	NOX	N/3	C/A	
·	i.	Are they on ;	cellets?	YES	NO	N/A X	C/A	
	ii.	Is there adea						ì
				YES	ио	N/AX	C/A	
SECTION	E. DECC	NOITAMINATION		•				
1.	equipmen	facility dra t containing ? ARE NoT	PCB chemical	substances	or mix	tures c		
-				YES	NO -	N/AX	C/A	
	against	irzinage and s spills and le ling area and	aks and conse				ct.	•
				YES	NO	N/A X	C/A	
3.	Do solve PCEs?	ents to be use	d for removin	ig PC3s con	cain le	ss than	£20.0	
4.	Was a sa obtaine	emple of the s i?	olvent that :	YES used io	NO F PCB R	N/Y X	C/A	
: -				YES_	_ NO	N/Y X	C/3	
5.		rinse volume tainer's total		ant approxi	mately	equal t	:3	
				YES	_ NO	X/AX	C/A	•
6.	Are PCB stand f	containers co or 18 hours be	ampletely fill efore being d	led with so rained?	lvent a	and allo	wed to	
	1F	THIS WORK	Y IS DONE	YES_	NO_	N/AX FUTUR	C/A € /T u	ا ر ل
	DON	E BY CONTR	ACT.					

b. Are there any large high voltage capacitors next to the storage area?

		w					2.	ָ ר ר	λ ^μ .	SECTION		10.	φ •	ω		7.
(If no, document in log book.)	a. That all FCB articles or FCB conta before January 1, 1983, have been disposed of before January 1, 1984	Do records indicate:	d. Date PCBs are placed in transport for disposal?	c. Date 705s are placed in storage?	b. Date PCEs are removed from service?	a. Date of receipt of PCB materials?	Do recorás indicate:		ere records maintained for PCB articles to the facility? (If no,	F. RECORDS		Does facility have written decontamination	If decontamination procedures were not of did facility representatives demonstrate decontamination procedures?	Are solvents or materials which have been of PCB equipment disposed of or stored in mixtures?	Lef.	Are the drained PCB chemical substances properly disposed of or stored?
YES NO	containers stored been ramoved from 1984?		NO.	NO X SES	AZZ X NO	AZZ X NO		AES X SEA	, substance tions 2—11		YES NO	ion procedures?	oserved knowled	used for the same	YESNO	or PC3 solvent
N/A X C/A	d for disposal		N/A C/A	_ N/A C/A	_ \(\frac{\frac{1}{2}}{2} \)	_ N/A C/A	•	N/A C/A	s, or mixtures in Section F ne	•	N/A X C/A	res?	during inspection.	decontemination manner as PCB _ N/A _ C/A	N/A X C/A	ent mixtures

		Ď,
aced in storage?	removed from storage and disposed of within one year	That PCBs stored for disposal after January 1, 1983, h
	g ct	have been
٠	G.	Q.
		(0

no, document log book. ö

N/AX C/A

ÎE

records indicate quantity of PCB articles, substance at the end of a calendar year? substances

XX C/3

- prensioniers
- Strate &

 $\widehat{\nu}$ Weight of ECB

042 χ (Ω (Λ)

- capaci tors
- Quantity large high voltage 193 large low woltage 90
- Qυ≥ೂಕ್ತು ಕ್ರಾ others 0
- Weight of PCB in capacitors Substances OF BLIXTUYES contained

5917

Containers

Weight of PCB substances or mixtures in containers

YOU'N

Bixtizes in FOB Contminers not indicate the total quantity of FC3 substances Q

ON X SEX K K

FI ves, characterize Calor.)

Serroved. from service

16/5.95 kgs.

Placed ; storage for ದೆ ತಯಽ೭

1615,95 l Xus

Placed Danely Ξ. transport for disposal 0

total grantity ö

(If yes, CTETACCETT TO Delow.) service?

Recordings

indicate

[†. 10

O Fh

PCB transformers not in

, YUN

Acc Z SERVICE (

	a. Removed from service	•
	1) Quantity	0
-	2) Weight of PCBs contained	O kgs.
	b. Placed in storage for disposal	
	1) Quantity	
,	2) Weight of PCBs contained	o kgs.
	c. Place in transport for disposal	
	1) Quantity	<u> </u>
	2) Weight of PCEs contained	<u> </u>
7.	To records indicate the total quantity voltage capacitors not in service?	of large nich and low
	(If yes, characterize below.)	YES NO N/A C/A
	a. Removed from service	kgs.
	b. Placed in storage for disposal	
	1) Quantity High vo	oltage O low voltage O
•	2) Weight of PCBs contained	O kgs.
:	c. Placed in transport for disposal	
	1) Quantity High Vol	itage O low voltage O
٠	2) Weight of PCBs contained	<u> </u>
8.	Do records indicate the location of the storage facility for PCBs removed from	ne initial disposal or n service?
	(If yes, list location of facility.).	YES X NO N/A C/A
	HULO STORAGE BLDG.	
	ON SITE	

9.	Do records indicate name of owner or operator of disposal or storage facilities? (If yes, list name of owner or operator.)							
	(ir jes, rise hand or owner or operate	YES ✓ NO	N/AC/A					
	REPUBLIC STEEL	,						
10.	Does annual report include records of chemicals, articles, and mixtures?							
		YES X NO	N/A C/A					
11.	Des annual report contain:							
	a. Date and source of PCB articles, o received?	hemicals, and	i mixtures					
-		YES X NO	N/A C/A					
	b. Date and type of articles, chemical service?	us, and mixtu	res removed from					
		aer Vo	N/A C/A					
t .	c. Accounting of amount received, and remaining at facility?	ount removed,	and anount					
**		YES X NO	N/AC/A					
12.	Are pertinent documents, correspondent federal, state, or local agencies main years?							
	years:	YES_X NO_	N/A C/A					
13.	If owners or operators maintain more to contains PCBs in the quantities preson records and documents kept at a single	cibed in A.l.						
	(If yes, list the location.)	AER NO	N/A X C/A					
			_					
		·	_					
14.	If facility has closed down storage or regional administration been properly		erations, has					
		YESNO	N/A X C/A_					

15. Do facility records for PCBs received, in service, in storage, or disposed of, correspond to inventory data compiled in Section A5? (If no, indicate area of discrepancy.)

YES X NO N/A C/A

APPENDER 2-2

REGULATION REFERENCE FOR INSPECTION QUESTIONS

Section in Inspection Report Form	Question Number	PCB Disposal and Marking Regulation Reference
JA. Inventory		
	1 2 3 4 5	761.45(a) 761.2 (c) 761.2 (r) 761.2 (s)
	6 7	761.2 (k) 761.2 (k)
O R. Storage and Handl	ing	
	1 2 3 4 5	761.42 761.42(b) 761.20(a), 761.44 761.42(c) 761.42(c)
E C/ Decontamination		
	1 2 3 4 5 6 7 8 9 10	761.43(a) 761.42(b) 761.43(a) 761.43(a) 761.43(a) 761.43(a) 761.43(b)
(な、Records	•	
	1 2 3 4 5 6	761.45(a)(1,2) 761.45(a)(3i) 761.45(a)(3ii) 761.45(a)(3iii) 761.45(a)(2) 761.45(a)(2)

APPENDIX 2-2 (Cont'd)

P. Records (cont'd)

7			•		761.45(a)
8					761.45(a)
9					761.45(b)
10					761.45(a)
11.				,	761.45(b)
12	. •				_



Rei

Hazardous Waste Republic Steel Corp. Cuyahoga County Moth

Mr. Lawrence Aguier Superintendent Environmental Control Republic Steel Componation 3100 East 45th Street Cleveland, Ohio 44127

May 12, 1981

Dear Mr. Aguier:

This letter is written to correct an error which appeared in the April 22, 1981, RCRA inspection report. The Republic Steel Corporation does not have a solvent recovery facility at the 45th Street site in Cleveland.

Please forgive the confusion.

Sincerely,

Melinda Merryfield-Becker Solid Waste Scientist

MMB:mjo

cc: Dale E. Papajcik, Republic Steel, General Offices, Cleveland Paula Cotter, CO Brenda Lillstrom, USEPA, Chicago



Re: Hazardous Waste Republic Steel Corp.

Cuyahoga County

Mr. Lawrence Aguier Superintendent Environmental Control Republic Steel Corporation 3100 East 45th Street Cleveland, Ohio 44127 April 22, 1981

Dear Mr. Aguier:

The Ohio Environmental Protection Agency is cooperating with U.S. EPA Region V in carrying out the provisions of the Resource Conservation and Recovery Act of 1976, Public Law 94-580. In this effort, personnel of the Ohio Environmental Protection Agency are conducting inspections of facilities in Ohio that are engaged in the generation, transportation, storage, treatment or disposal of hazardous waste materials.

This letter is to inform you that on April 8, 1981, an inspection of Republic Steel Corporation's facility, located at 3100 East 45th Street was conducted by me and Ms. Paula Cotter of the Ohio Environmental Protection Agency. You, Mr. Dale Papajsik and Mr. Tom Krupka represented Republic Steel Corporation. The following concerns pertaining to your facility were noted:

- Although most of the information required in the operating report is available, this information should be consolidated under one single report as required by 40 CFR Part 265.73.
- 2. Inspections should be more carefully logged as required by 40 CFR Part 265.15.
- 3. The SPCC plan should be ammended to include hazardous wastes as required by 40 CFR Part 265 Subpart D. However, it was noted that the Job Safety Analyses do much to supplement your SPCC plan.
- 4. The solvent recovery system is subject to storage requirements since the solvents which are being recovered are listed hazardous wastes. This storage area was not inspected, but you should be aware that it is subject to 40 CFR Part Subpart I and/or J.
- 5. The status of the Decanter Tar Sludge recycling through the coke batteries is unclear. If Republic Steel is unable to justify the benefit (BTU value etc.) of the recycling, EPA may subject this system to the thermal treatment requirements 40 CFR Part 265 Subpart P.

Republic Steel Corp. April 22, 1981 Page 2

A copy of this letter and the inspection report will be sent to the U.S. EPA Region V office in Chicago. If you have any questions, please contact me at (216) 425-9171 or Ms. Brenda Lillstrom (312) 886-3899 of U.S. EPA Region V.

Sincerely,

Melina Muyfull-Beder Melinda Merryfield-Becker Solid Waste Scientist

MMB:mjo

Enclosure

cc: Paula Cotter, CO

Brenda Lillstrom, USEPA, Chicago

Cleveland City Health Dept.

APR 1 0 1981

Referral Number: <u>OHH-81-37</u>

Region V Site No: 040000 10008

HAZARDOUS WASTE REFERRAL

Contacts

Paul Dimores. Compliance Section

Engineering Section

. Jegal Section

Site Name: Republic Steel Corp.

Site Location: 3100 East 45th Street Cleveland, Shio

Owner/Operator: Same as above

Permitted Site: FILING FOR PART A UNDER RCRA

Permit Number & Issue Date (if applicable):

Apparent Violations:

AUTENTIAL TOSCH CASE

PCB STORAGE (500, 1000 PPM)

(MDR's, Letters, Reports, Phone Memos, Field Surveys, Photographs, etc.)

1 copy of Hayardous waste committee commente

2. Letter from hich shorder to have down dated Feb. 18, 1981

3. meno from Eugene mayor dated Feb. 18, 1981

4. Letter from Republic Steel dated Feb. 7, 1981

5. Letter from Republic Steel dated Jon. 19, 1981

List Previous violations and subsequent action taken:

Compliance Section Recommendations:

Committee recommended this case he directed to Mike Walker for possible case development

Technical Evaluation and Action Development (To be filled out by Engineering Section)

Nate Received:		
Assigned to:		<u> </u>
Nate Evaluation and Action Development		
to be Completed:	. 8	

Additional Contacts/Documentation Developed (including phone memos to or from permittee and to or from State):

Engineering Section Recommendation:

Specify, Develop and Attach Action Documents: (including cover memos)

Legal Evaluation (To be filled out by Legal Section)

Date Received: _	
Assigned to:	
Date Review to b	e Completed:
Date Review 50 5	
	Additional Contacts/Documentation Developed
(including	phone memos to or from permittee and to or from State):
•	
• •	
•	
•	
	Legal Section Recommendation:
	•
	REMARKS (To be filled out as appropriate)
	ACTION INITIATED
	(To be filled out by Compliance Section)
TYPE OF ACTION	
Date INITIATED	
DATE CLOSED OU	1.

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60.	AND THE PROPERTY.	
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POTENTIAL HAZARDOUS WASTE SITE FINAL STRATEGY DETERMINATION

REGION	SITE	NUN	18EA

	TEGI DETERM						
File this form in the regional Hazardous Waste Log om; Hazardous Waste Enforcement Task Force	; File and submit e (EN-335); 401 M	a copy to: U. St., SW; Was	S. Environm hington, DC	iental Pro 20460.	staction Ag	ency; Site	Tracking
	I. SITE IDENTI			1.			
Lipublic Steel	I, JIL IDENTI	3100 E	est 45	-CL 36	tuet		
Cleveland		Chi		}	E. 21	P CODE	
	II. FINAL DETE						
Indicate the recommended action(s) and agency(ies	s) that should be i	nvolved by ma	arking 'X' i	the appr	opriate box	es.	
RECOMMENDATION			MARK'X'	EPA	ACTION STATE	AGENCY .	PRIVATE
A. NO ACTION NEEDED			X	X			
8. REMEDIAL ACTION NEEDED, BUT NO RESOURCE (II yes, complete Section III.)	S AVAILABLE						
C. REMEDIAL ACTION (If yes, complete Section IV.)		······································				ļ	
D. ENFORCEMENT ACTION (If yes, specify in Part E managed by the EPA or the State and what type of er		II be primarily anticipated.)					
E. RATIONALE FOR FINAL STRATEGY DETERMINA	TION		•				
Case referred to Topic y	for follow	-up				•.	
		•					
					÷		
F. IF A CASE DEVELOPMENT PLAN HAS BEEN PRE THE DATE PREPARED (mos, day, & yrs)	PARED, SPECIFY	G. IF AN ENI DATE FIL	FORCEMENT ED (mo., day		S BEEN FIL	ED, SPEC	IFY THE
H. PREPARER INFORMATION		1	· · · · · · · · · · · · · · · · · · ·				
1. NAME J. Koch		886-6	TIV	₹	3.0	8/8/	iay, & yr.)
III. REMEDIAL ACTIONS	TO BE TAKEN WA			ME AVAII	LARIF		
List all remedial actions, such as excavation, removed for a list of Key Words for each of the actions to remedy.	noval, etc. to be to	aken as soon	as resource	s become	available.	See instr ximate co:	ructions st of the
A. REMEDIAL ACTION	B. ESTIMAT	ED COST		c	. REMARKS		
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POTENTIAL HAZARDOUS WASTE SITE IDENTIFICATION

NOTE: The initial identification of a potential site or incident should not be interpreted as a finding of illegal

REGION SITE NUMBER

activity or confirmation that an actual health or environm be assessed under the EPA's Hazardous Waste Site Enfo a hazardous waste problem actually exists.		
A. STE NAME . B. STE	REET (or other identifier)	to Start
d. city Cleveland		F. COUNTY NAME
G. OWNER/OPERATOR (if known) 1. NAME	/	2. TELEPHONE NUMBER
H. TYPE OF OWNERSHIP (il known) 1. FEDERAL 2. STATE 3. COUNTY 4. MUNICIPAL	S. PRIVATE	6. UNKNOWN
I. SITE DESCRIPTION		
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J. HOW IDENTIFIED (i.e., citizen's complaints, OSHA citations, etc.)		K. DATE IDENTIFIED
L. SUMMARY OF POTENTIAL OR KNOWN PROBLEM		
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M. PREPARER INFORMATION	2. TELEPHONE NUMBER	3. DATE (mo., day, & yr.)
S. Koay	886-6714	4/8/81

EPA Form 2070-8 (5-80)

STATE BOARD OF HEALTH

AN EQUAL OPPORTUNITY EMPLOYER



INDIANAPOLIS

Address Reply to: Indiana State Board of Health 1330 West Michigan Street P. O. Box 1964 Indianapolis, IN 46206

June 30, 1981

Mr. Richard Shandross State Implementation Officer U.S. Environmental Protection Agency Region V 230 South Dearborn Chicago, IL 60604

Dear Mr. Shandross:

RECEIVED

JUL 2 - 1981

WASTE MANAGEMENT BRANCH

Re: Manifest Violation Disposition Forms

Enclosed please find Manifest Violation Disposition Forms for the following:

- 1. Aluminum Company of America, Lafayette, Indiana
- Republic Steel Corporation, Cleveland, Ohio
- 3. U.S. Steel Corporation, Fairfield, Alabama
- 4. Bennett Industrial, Peotone, Illinois

If you have any questions, please contact Mr. Dave Berrey at AC 317/633-0813.

Very truly yours,

Guinn Doyle, Supervisor Hazardous Waste Program

Solid Waste Management Section

Division of Sanitary Engineering

DBerrey/jb Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCE REGION V

DATE: February 18, 1981

SUBJECT: Manifest Exception Reports

Eugene Meyer, Ph.D. Zugene FROM: Chief, Technical Programs\Section

Mariann Baumgartner, Chief Unit I, Compliance Section

> Attached are the following Manifest Reports which have been received by this office, in addition to a copy of the cover letter transmitting copies of these reports to the appropriate States for follow-up.

1. Aluminum Company of America, Lafayette, Indiana

2. Atlas Crankshaft Corporation, Fostoria, Ohio

3. Ford Motor Company, Dearborn, Michigan __ per teleron on 3-6-81 at 3:55 p.m. with

> Penny Rosewonkel A+HMD, no

> > cover ter, was

Mrs

sent to MONR.

4. Republic Steel, Cleveland, Ohio

5. U. S. Steel Corporation, Fairfield, Alabama

Attachments (five)

cc: (without attachments) Dale Bryson David Kee Bill Constantelos Karl Klepitsch



UNITED STATES **ENVIRONMENTAL PROTECTION AGENCY** REGION V

230 SOUTH DEARBORN ST: CHICAGO, ILLINOIS 60604

MAR 3 10 10 AM '81 SAHITARY ENCINEERING STATE BOARD OF NEALTH

February 18, 1981

Mr. David Lamm Chief, Solid Waste Management Section Indiana State Board of Health Division of Sanitary Engineering 1330 West Michigan Street Indianapolis, Indiana 46206

Dear Mr. Lamm:

Enclosed please find three Manifest Reports which were received by this office. The original reports are being sent to our Enforcement Division; copies are being forwarded to you for review and follow-up with the disposal facility located in your State.

Sincerely yours,

Richard Shandross

Rehard Shandress

State Implementation Officer

Enclosures: 1. Aluminum Company of America, Lafayette, Indiana

2. Republic Steel Corporation, Cleveland, Ohio-

3. U. S. Steel Corporation, Fairfield, Alabama

MANIFEST VIOLATIONS DISPOSITION FORM

*Type Report

	U = Unmanifested Waste Report from TSD Facility D = Discrepancy Report from TSD Facility	
1.	*Type Report:	seena ye iili iili iili iili iili iili iili i
2.	Reported by:	
	a. Date of Report FEB 2 1981	The problems where is a second of the problems
	b. Name REPUBLIC Steel CORPORATION-Environmental Cont	10
	Address POBOX 6778 Street or Route Number	Section 2.
	CLEAVELAND OHO 4410/ City or Town State Zip Code	ig Code
	Phone No. 216-622-5915 Area Code & Number	/ 18 sent formerender i
	c. EPA I.D. No. OHD 060 409 521	e en
	d. Manifest Document No. 014313	enter a propriate de la companya de la companya de la companya de la companya de la companya de la companya de
3.	Ω	e san Book portage
4.	Description of State follow-up action (including name of State assignee, file data reviewed, person(s) contacted by State, date(s) and type of contact(s), and information obtained): (INLLED D.E. PAPA JCIK, TSD HAD OVERLOGKED SENDING BACK GENERATOR COPY OF MANIFEST, WASTE WAS RESIED ON DEC 5, 1980, WHEN CALUBORE PUBLIC STEEL HAD RESIED SIGNED COPY OF MANIFEST. (DAVE BERREY, ISBH) List of Supporting Documents Attached: 1 CAUE BERREY, ISBH)	r ha— Stymir ●
5.	List of Supporting Documents Attached: COPY OF MANIFEST - COPY OF LETTER FROM REPUBLY TO BY-PRODUCTS MANAGEMENTS	ic Steek
6.	COPY OF EXCEPTION REPORT	
٠.	Wolle	
7.	Disposition Form Signed and Dated by State:	

Muins Poyle G/19/8/

Femuliesteel

Republic Steel Corporation General Offices: Republic Building Environmental Control PO Box 6778 Cleveland OH 44101

February 2, 1981

WL West Director WB Tucker Jr. Assistant to the Director CM Brown Assistant Director—Air

Regional Administrator U.S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, Illinois 60604

WASTE MANAGEMENT BRANCH EPA, PERGION V

FEB 5 1001

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Dear Sir:

In accordance with 40 CFR Part 262.42(b); Republic Steel Corporation is filing an Exception Report concerning Hazardous Waste Manifest No. 014313.

On December 5, 1980, a shipment of waste hydrochloric acid left the Republic Steel Corporation Mahoning Valley-Warren plant enroute to the By Products Management facility, 1150 Junction Avenue, Schererville, Indiana. This shipment was accompanied by Republic Steel Hazardous Waste Manifest No. 014313.

As of January 9, 1981, Republic Steel had not received a copy of the manifest. By Products Management was then contacted per the attached letter. No reply was received from By Products Management and so they were contacted by phone. The By Products Management representative stated that Republic Steel Hazardous Waste shipment No. 014313 was received on December 5, 1980, and that a disposal facility file copy of Manifest No. 014313 is in their possession. A copy is being forwarded to Republic Steel.

However, since Republic Steel Corporation has not received a copy of Hazardous Waste Manifest No. 014313 within forty-five days of the date the waste was accepted for transporting, this Exception Report is being filed.

D. E. Papajcik

Solid Waste Management Engineer

DEP:nf Attach. 10

Reguellestee!

Republic Steel Corporation General Offices: Republic Building Environmental Control PO Box 6778 Cleveland OH 44101

January 19, 1981

WL West Director WB Tucker Jr. Assistant to the Director CM Brown Assistant Director—Air Mr. Al Tenney - 319-322-2543

Mr. Al Tenney - 319-322-2543

By-Products Management
1150 Junction Ave.
Schererville, Indiana 46375

Re: Republic Steel Hazardous Waste Manifest No. 014313 pcc 21

Republic Steel Corporation is contacting you to determine the status of hazardous waste shipped to you.

To date Republic Steel has not received a copy of Hazardous Waste Manifest No. 294878 from your disposal facility. In accordance with 40 CFR, Part 262.42, Republic Steel must receive a copy of the manifest with the hand written signature of the owner or operator of the disposal facility within 35 days of the date the waste was accepted by the initial transporter. The 35-day grace period expired on $\overline{140.99.999}$. If the manifest is not returned by $\overline{130.099.999}$, Republic must submit an exception report to the United States Environmental Protection Agency.

Republic Steel Corporation would greatly appreciate you reviewing your records and sending us the completed manifest or other official confirmation that the waste, as described in Republic Steel Hazardous Waste Manifast No. <u>214313</u>, was received by your facility.

If this waste shipment was not received by your facility, or if you encounter any further difficulties in this regard, please contact me immediately at 216/622-5915.

Thank you for your cooperation.

Sincerely yours,

D. E. Papajcik

Solid Waste Management Engineer

DEP:nf Attach.

bcc: Messrs. W. L. West

J. D. Donohoe

C. Powers

J. C. Yorko.

D. E. Kelker

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CO. T.A.N.K. T.R.K	<u>1</u>	Spent Pickle Ligoor HF Netric & Sulfatin	Wasta Hydroffuone, Nitrio & Suffuric Acid Mixtura	. "		:JN-1786	"
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F		Paint Sludges	Hazardous Waste. Solid N O S.	ОЯМ-€	12	NA-9139	F
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WASTE FACTORY STATES		PHINTED	in 15000 at the argsessionery	,,	parter and		
2	GATE	- FORWARD TO DISTRICT/I	DIMISION ACCTO				

DATE JAN	2 7 1981
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esserct Request For: PCB Inspection at Republic Steel Corporation, Cleveland, Ohio

FHOM: William H. Miner, Chief WHAT Engineering Section

το: Rich Winklhofer, Chief Eastern District Office

Project Objective: To verify if PCB contaminated oil is generated at facility, which is then sold to a re-refiner and bought back. Approximately 30,000 gallons per week are affected. Sampling is requested from locations determined during the inspection to verify and document PCB contamination. Samples of re-refinined bought back oil should also be taken. All analysis will be for PCB

DECISION DATE BOOK SPECIFIC MOUTHING
Desired Completion Date <u>1-30-81</u> Authority Law/Section TSCA
Principal Contact: Michael Mutnan Phone 886-6770
Date:
Subject: Acknowledgment of Receipt of Work Request
From:
To:
will do the above work (as specfied) (with modifications).
Target Comp. Date: S&A Project No. Est. Cost_
S&A Project Leader: Phone
Comments:

1.	THE RESTRICT TOTALLY OF SHOWING	-		
Α	. GROUND WATER	E. AIR	I. SLUPSE	
В	. SURFACE WATER	F. SOIL	J. OIL	5
¢	. RUNOFF/LEACHATE	G. SEDIMENT	K. OTHER	
Đ	. WASTE STREAM	H. BARREL		
II.	ANALYTICAL ANALYSIS REQUIRED			
A	. METALS - ICAP			•
	BY FLAMELESS AA:			
	a. LEAD	d MERCURY		
	bARSENIC	e. CADMIUM	- ;	
	c. SELENIUM	f. HEXAVALENT		
و دوجه د هما	kalenter for en en en en en en en en en en en en en	. A. g OTHERS	<u> </u>	ې ستارورونو
В	. CYANIDES			
C	. ORGANICS			
	a. BASE NEUTRAL FRACTION (PRI	MARILY, SUBSTITUTED BENZEN	ES OTHER	
	THAN PHENOLS)			
	b. PESTICIDE FRACTION AND TR	ACE CHLORINATED ORGANICS _		
	c. PURGEABLE ORGANICS (HIGHL	Y VOLATILE SOLVENTS)		
	d. ACID FRACTION (PHENOLICS)			
	e. ORGANIC SCAN - SEDIMENTS	(HEXANE/ACETONE EXTRACT) _		
	f. PCBs X			
٠. ٥	. ALL NPDES PERMIT PARAMETERS _			
E	OTHER			
cc:	MITCH-II . SEA - TECH DISTRICT OFFI	Siggort Bri CE		
	CHARTE DOCC COL			
bcc:	Miner wan fall went Grimes/Walker			
	Leder Reading File			

Republicsteel

Republic Steel Corporation **General Offices: Republic Building** Environmental Control PO Box 6778 Cleveland OH 44101

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February 2, 1981

FEB 5

WASTE MANAGEMENT BRANCH EPA, REGION V

WL West Director WB Tucker Jr. Assistant to the Director CM Brown Assistant Director—Air

Regional Administrator U.S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, Illinois 60604

Dear Sir:

In accordance with 40 CFR Part 262.42(b), Republic Steel Corporation is filing an Exception Report concerning Hazardous Waste Manifest No. 014313.

On December 5, 1980, a shipment of waste hydrochloric acid left the Republic Steel Corporation Mahoning Valley-Warren plant enroute to the By Products Management facility, 1150 Junction Avenue, Schererville, Indiana. This shipment was accompanied by Republic Steel Hazardous Waste Manifest No. 014313.

As of January 9, 1981, Republic Steel had not received a copy of the manifest. By Products Management was then contacted per the attached letter. No reply was received from By Products Management and so they were contacted by phone. The By Products Management representative stated that Republic Steel Hazardous Waste shipment No. 014313 was received on December 5, 1980, and that a disposal facility file copy of Manifest No. 014313 is in their possession. A copy is being forwarded to Republic Steel.

However, since Republic Steel Corporation has not received a copy of Hazardous Waste Manifest No. 014313 within forty-five days of the date the waste was accepted for transporting, this Exception Report is being filed.

Sincerely yours

D. E. Papajcik

Solid Waste Management Engineer

DEP:nf Attach. The

Ecree Esteel

Republic Steel Corporation **General Offices: Republic Building** Environmental Control PO Box 6778 Cleveland OH 44101

January 19, 1981

WL West Director WB Tucker Jr: Assistant to the Director CM Brown Assistant Director—Air Mr. Al Tenney

By-Products Management
1150 Junction Ave.
Schererville, Indiana 46375

Re: Republic Steel Hazardous Waste Manifest No. <u>014313</u> Pec 21

Republic Steel Corporation is contacting you to determine the status of hazardous waste shipped to you.

To date Republic Steel has not received a copy of Hazardous Waste Manifest No. 2/93/3 from your disposal facility. In accordance with 40 CFR, Part 262.42, Republic Steel must receive a copy of the manifest with the hand written signature of the owner or operator of the disposal facility within 35 days of the date the waste was accepted by the initial transporter. The 35-day grace period expired on 240.9/3/1. If the manifest is not returned by 29.193/1. Republic must submit an exception report to the United States Environmental Protection Agency.

Republic Steel Corporation would greatly appreciate you reviewing your records and sending us the completed manifest or other official confirmation that the waste, as described in Republic Steel Hazardous Waste Manifast No. <u>014313</u>, was received by your facility.

If this waste shipment was not received by your facility, or if you encounter any further difficulties in this regard, please contact me immediately at 216/622-5915.

Thank you for your cooperation.

Sincerely yours,

D. E. Papajcik

Solid Waste Management Engineer

DEP:nf Attach.

bcc: Messrs. W. L. West

J. D. Donohoe

C. Powers

J. C. Yorko

D. E. Kelker

SECTION : TO BE COMPLETED	BY GENERATUR		<u>)-</u>	12-3		. مال الا : 	30
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O TANK TRK	1 1 1	Spent Pickle Liquar ; HF Nitric & Sulfuria	Waste Hydroffuoric, Nitric & Sulfuric Acid Mixture	4·.		UN-1785	×
	;	Blast Furnace Studge. Dewatered	Hazardous Waste. Solid N.O.S.	ORM-E	12	NA-9189	,
		Coke Plant Tar Decanter Tank Sludge	Hazardous Waste, Solid N.O.S.	ORM-E	12	NA-9189	ļ ,
		Paint Sludges	Hazardous Waste, Solid N.O.S.	ORM-E	12	NA-9189	
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Re: DHM

Republic Steel - Cleveland District

Cuyahoga County

Permit No. 02-18-0186

August to, 1982

Mr. Lawrence Aguier Republic Steel 3100 East 45th Street Cleveland, Ohio 44127

Dear Mr. Aguier:

I conducted a hazardous waste inspection at the Republic Steel Cleveland District facility located at 3100 E. 45th Street on June 11, 1982. You, Mr. Girdler, Mr. Gubanc, and Mr. Broestl represented the facility during the inspection. The facility was inspected for compliance with both State and Federal regulation for the handling of hazardous wastes. The inspection report indicates the facility is in general compliance with the regulations.

A copy of the inspection report is enclosed for your information. This inspection will become a part of the official records of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management and will also be forwarded to Kathy Homer of U.S. EPA Region V.

Please advise me or Kathy Homer at (312) 886-7435 if you have any questions.

Yours truly.

David M. Wertz Environmental Scientist Division of Air Pollution Control

DAW: Cll

Enclosure

cc: Ms. Paula Cotter, Div. of Hazardous Materials Management, Central Office Mr. Bob Fragale, Hazardous Waste Facility Approval Board, Central Office Ms. Kathy Homer, U.S. EPA Region V

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_ <u> </u>	i. Generator's Phone (216) 429–637		H D US EPAID N	unaber 7 8 0	C. State T	ransporter's ID	216/3	72-5002
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	14 CENEDATOR'S CERTIFICATION: I hereby de	clare that the contents of	this consignment are ful	ly and accurately de	scribed abov	e by proper ship	ping name	and are classified,
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	16. GENERATOR'S CERTIFICATION: I hereby declare that the con packed, marked, and labeled, and are in all respects in proper cond if I am a large quantity generator, I certify that I have a progreconomically practicable and that I have selected the practicable threat to human health and the environment; OR, if I am a sma waste management method that is available to me and that I can after	tents of this consignment are fully a trion for transport by highway accord am in place to reduce the volume method of treatment, storage, or Il quantity generator, I have made lord.	and toxicity of disposal current	waste g lv availal	enerated to the deg	ree I havinizes the	ve determined to be a present and future
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1	3. Generator's Name and Mailing Address LTV Steel Co., Inc Environmental			A. State	Manifest Docum	ent Numi	Der - J <u>ulyan</u> d
	3100 East 45 Street, Cleveland, Ohio	o 44127		B. State	Generator's ID		
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	11. US DOT Description (Including Proper Shipping Name, Hazard Cla	ass, and ID Number)	12. Cont No.	ainers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
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	16. GENERATOR'S CERTIFICATION: I hereby declare that the content packed, marked, and labeled, and are in all respects in proper condition. If I am a large quantity generator, I certify that I have a program economically practicable and that I have selected the practicable me threat to human health and the environment; OR, if I am a small quaste management method that is available to me and that I can afford	is of this consignment are fully and ac in for transport by highway according to in place to reduce the volume and without of treatment, storage, or dispo- uantity generator, I have made a go	curately de- applicable toxicity of sal currently	scribed ab internation waste ger r available	nat and national go nerated to the deg e to me which mini	ree i hav mizes the	e determined to be present and future
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	5.	UNIFORM HAZARDOUS	1. Generator's US	EPA ID No. 4. 2. 1. 8. 6. 7 . 3	Manifest Document No. 9 · 3 · 2 · 6 · 8	2. Page of	e 1 Information not require	on in the s ed by Fed	haded areas is eral law.
+	3.	WASTE MANIFEST Generator's Name and Mailing Address				A. Stat	e Manifest Docum	SZ6	
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	7.	Transporter 2 Company Name (8. US EPA ID No		F. Tran	sporter's Phone		
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	7	Oregon, Ohio 43616 1. US DOT Description (Including Proper Shipp)	ing Name, Hazard Cla	OHDO45:		ntainers	13. Total	14, Unit	i.
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	-	 J. Additional Descriptions for Materials Listed A	bove		_	K. Ho	indling Codes for	Wastes List	ed Above
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	$\ \cdot\ $	1/ CENTRATORIC CERTIFICATION: I have build	eders that the contents o	f this consignment are fully as	nd accurately descri	bed above	by proper shipping n	ame and ar	e classified, packed,
		marked, and labeled, and are in all respects in p ff I am a large quantity generator, I certify that I ha and that I have selected the practicable method of		reduce the volume and toxicit	v of waste aenerate	d to the dec	ree I have determine	d to be econ	omically procticable
		ond that I have selected the practicable method of OR, if I am a small quantity generator, I have made afford.	treatment, storage, or all de a good faith effort to r	ninimize my waste generation	and select the best	waste man	agement method that	is available	to me and that I can
١		Printed/Typed Name S. Rih	tar	Signature	Rih	ta	لحري	I	onth Day Year).4 1.4 9.3
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	B. Generator's Name and Mailing Address LTV Steel Co., Inc Environmental 3100 East 45 Street, Cleveland, Ohi 6. Generator's Phone (216) 429-6370	Control Dept. o 44127			te Generator's ID	ient Numb 3 2 7	3
	5. Transporter 1 Company Name MOCION BYLK Compadities 7. Transporter 2 Company Name	6. US EPA ID NO 0H. D. 9.8.7.0	mber よ.1 の.)	9 D. Tro	inte Transporter's ID	119385	447
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	9. Designated Facility Name and Site Address Envirosafe Services of Ohio, Inc. 876 Otter Creek Road	10. 00 EFA 10 14			cility's Phone		
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	J. Additional Descriptions for Materials Listed Above Coal Tar - Contaminated Soil 15. Special Handling Instructions and Additional Information 11a. GSN 11637-012 FRG 24-Hr. Emergency Contact 419/691-0	LTV	Complet Steel - East 45	ed For	m To: ontrol Dep Cleveland,	(cee t. 2	- G- 13.84T
	16. GENERATOR'S CERTIFICATION: I hereby declare that the contents marked, and labeled, and are in all respects in proper condition for trail if I am a large quantity generator, I certify that I have a program in place the and that I have selected the practicable method of treatment, storage, or does, if I am a small quantity generator, I have made a good faith effort to afford.	isport by highway according to o reduce the volume and toxicity isposal currently available to ma	applicable inter of waste genera which minimizes	national and ted to the de the present o	national government gree I have determine and future threat to hui	ed to be econ man health o t is available	ns. comically practicable and the environment; to me and that I can
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1		Generator's Name and Mailing Address LTV Steel Co., Inc Environmental Control Dept. 3100 East 45 Street, Cleveland, Ohio 44127 Generator's Phone (216) 429-6370				A. State Manifest Document Number V 1 9 3 2 7 5 B. State Generator's ID					
	5.	Transporter 1 Company Name Dart Trucking Co.	mber . 6, 5, 8			C. State Transporter's ID D. Transporter's Phone 216/533-9841					
ľ	7.	Transporter 2 Company Name 8. US EPA ID Number					E. State Transporter's ID F. Transporter's Phone				
	9.	9. Designated Facility Name and Site Address 10. US EPA ID Number Envirosafe Services of Ohio, Inc.			umber						
		876 Otter Creek Road Oregon, Ohio 43616	1	О Н D Q 4 5 2 4 3 7 0 6			H. Facility's Phone 419/255-5100			는 설명 1984년 - 1	
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		16. GENERATOR'S CERTIFICATION: 1 hereby decimarked, and labeled, and are in all respects in proof if I am a large quantity generator, I certify that I have and that I have selected the practicable method of tre OR, if I am a small quantity generator, I have made	per condition for transpo a program in place to rec atment storage, or dispa	rt by highway according to duce the volume and toxicity sal currently available to me	applicable i of waste ge which minim	internation nerated to nizes the p	nal and n the degr resent and	ational governmenta ee I have determined I future threat to hum	to be eco an health	ons. nomically practicable and the environment;	
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1	3. Generator's Name and Mailing Address			•	· Z · / · 6		1 Ite Manifest Docum	ent Numi	<u> </u>		
11	LTV Steel Co., Inc 3100 East 45 Street, C	leveland. Ohi	Dept.		B. Sta	te Generator's ID	271	0			
	4. Generator's Phone (216) 429-6370								***		
	5. Transporter 1 Company Name Dart Trucking Co.		6. US EPA ID Number O. H. D. O. O. 9. 8. 6. 5. 8. 2. 5			C. State Transporter's Phone O. C. C. C. C. C. C. C. C. C. C. C. C. C.					
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	16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.										
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3.	Generator's Name and Mailing Address LTV Steel Co., Inc Envi				A. St	ate Manifest Decy	ment Nur 25	5
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3. Generator's Name and Mailing Address LTV Steel Co., Inc E	nvironmental Contro	ol Dept.	·	A. Stat	Manifest Docume	2 <u>6</u>	
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Envirosafe Services of 876 Otter Creek Road			700		ility's Phone 419/255-	5100	
Oregon, Ohio 43616		0. 4. 5. 2. 4. 3	, /, U, 6		13.	14.	
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waste management method that is available	to me and that I can arrora.	Signature	1/,	1/1	. 1 %		Month Day Year
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	16. GENERATOR'S CERTIFICATION: I hereby declare that the conterpacked, marked, and labeled, and are in all respects in proper condition. If I am a large quantity generator, I certify that I have a program economically practicable and that I have selected the practicable methreat to human health and the environment; OR, if I am a small of	nts of this consignment are fully and are on for transport by highway according to in in place to reduce the volume and lethod of treatment, storage, or dispo quantity generator, I have myde a gr	applicable toxicity of sal currently	internati waste go availat	ional and national go enerated to the deg ple to me which min	vernmento ree I hav imizes the	e determined to be present and future
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5.	Tran	nsporter 1 Company Name		6. US EPA ID O.H. D. G. 09.8	8.6.5	872	D. Trai	nsporter's Phone 2 te Transporter's ID		3-984
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	,	-	a. GSN 11637-012 -Hr. Emergency Contact	: 419/691-00	3100	teel - Env East 45 St		-		44127
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ť	20.	Facil	lity Owner or Operator: Certification of	receipt of hazardous	s materials covered by this	manifest except o	is noted in	Item 19.		
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	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA I	D No.	Manifest Document No. 9 - 3 - 2 - 8 - 9	2. Page 1 of 1	Into. not requ		
+	3. Generator's Name and Mailing Address	<u> </u>	40010	<u> </u>		Aanifest Docur	nent h	
	LTV Steel Co., Inc Envi						1 2 1 - 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
	3100 East 45 Street, Cleve 4. Generator's Phone (216) 429-6370		127			Senerator's ID		
Ī	5. Transporter 1 Company Name	6.	US EPA ID N			ransporter's II		
-	Buffalo Fuel Corp.	[N · Y	D · O · 5 · 1 · 8			orter's Phone ransporter's IC		3-1921
1	7. Transporter 2 Company Name	I .	USEFAIDI			orter's Phone		
ŀ	9. Designated Facility Name and Site Address.	10.	US EPA ID N	umber		Facility's ID		
	Envirosafe Services of Ohi	o, Inc.				· · · · · · · · · · · · · · · · · · ·		M. Marie
1	876 Otter Creek Road	lo 1	D. 0. 4. 5. 2	/ 2 7 O 4	H. Facility	's Phone 419/255–	5100	
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	16. GENERATOR'S CERTIFICATION: I hereby declined packed, marked, and labeled, and are in all respect	are that the contents of this s in proper condition for tran	, consignment are ful asport by highway ac	ly and accurately de cording to applicable	escribed above e international	e by proper ship and national go	ping nathe vernmental	and are classified, regulations.
	If I am a large quantity generator, i certify that economically practicable and that I have selected	I have a program in plac	e to reduce the val	ume and toxicity of	waste genera	ated to the de	gree I have	determined to be
	threat to human health and the environment; OR,	if I am a small quantity (generator, I have m	ade a good faith e	ffort to minim	nize my waste :	generation o	and select the best
	waste management method that is available to me a Printed/Typed Name	nd that I can afford.	Signature	1 1	7.	1-1	М	onth Day Year
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	3100 East 45 Street, Cle 4. Generator's Phone (216) 429-63	veland, Ohio	_			B. Sto	rte Generator's ID		
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i	9. Designated Facility Name and Site Address Envirosafe Services of O		O. US EPA	D Number			ate Facility's ID		
	876 Otter Creek Road Oregon, Ohio 43616		O H D O 4. 5				cility's Phone 419/255-	-5100	* + :
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·· -	3. Generator's Name and Mailing Address LTV Steel Co., Inc E 3100 East 45 Street, Cl 4. Generator's Phone (216) 429-6	Leveland, Ohi	Control Dept.	a19	B. Sta	te Manifest Docum te Generator's ID		er
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Ī	3. Generator's Name and Mailing Address LTV Steel Co., Inc Environme 3100 East 45 Street, Cleveland, 4. Generator's Phone (216) 429-6370	ntal Control Dept.	J 	•	Manifest Docume OHO Generator's ID	ent Numb 0 \q	
	5. Transporter 1 Company Name PART Trycking INC	6. US EPA ID Numb	5825	D. Trans	Transporter's ID porter's Phone /	800 5	33-0255
	7. Transporter 2 Company Name	8. US EPA ID Numb	er	E. State Transporter's ID F. Transporter's Phone			
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	876 Otter Creek Road Oregon, Ohio 43616	O. H. D. O. 4. 5. 2. 4	. 3. 7. 0. 6		ly's Phone 419/255-1	5100	and Million and A
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	J. Additional Descriptions for Materials Listed Above Coal Tar - Contaminated Soil			K. Hand	Sc.	astes List	ed Above
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ÄTER	Printed/Typed Name	Signature			,	, Mc	onth Day Year
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		UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US	EPA ID No. 1 .2 .1 .8 .6 .7 3	Manifest Document No.	2. Pc	ge I Informa	tion in the	ne shaded areas is Federal law.	
	A	3. Generator's Name and Mailing Address LTV Steel Co., Inc Eng 3100 East 45 Street, Clean 4. Generator's Phone (216) 429-6370	vironmental (Control Dept	<u>19-3-2-6-9</u>	A. Si	I date Manifest Documents ID			
	5	Transporter Company Name	6.	US EPA ID Nu	mber	C. St	ate Transporter's i		* (2) 	
	7	DART TOUCKING :	INC, 8	. 8. 900 <u>0 (l. 14 c</u> US EPA ID NU		D. Tr	ansporter's Phone ote Transporter's IL	1-8	20-521-08	
	9	. Designated Facility Name and Site Address		<u> </u>	<u> </u>	F. Tro	insporter's Phone		<u> </u>	
		Envirosafe Services of Ob 876 Otter Creek Road	nio, Inc.). US EPA ID Nu	mber		ate Facility's ID			
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	Ľ	US DOT Description (Including Proper Shippin HM	g Name, Hazard Class,	and ID Number)	12. Conte	ainers Type	13. Total Quantity	14. Unit	i. Waste No.	
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		S. Rihtar		Signature	Riht	ar.		Mo 1/).	oth Day Year	
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	19.	Discrepancy Indication Space	- NOT		<u> </u>			<u> </u>		
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Ī	3. Generator's Name and Mailing Address LTV Steel Co., Inc Envir 3100 East 45 Street, Clevel 4. Generator's Phone (216) 429-6370	onmental Contro and, Ohio 44127	l Dept.		A. State Manifest Document Number B. State Generator's ID					
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	16. GENERATOR'S CERTIFICATION: I hereby declare marked, and labeled, and are in all respects in prope lift am a large quantity generator, I certify that I have a and that I have selected the practicable method of treat OR, if I am a small quantity generator, I have made a gafford.	that the contents of this consignr condition for transport by highw program in place to reduce the vo	ay according to applications and toxicity of waste available to me which m	ble internation generated to inimizes the p	nal and r the degr resent an	ree I have determined d future threat to hun	ol regulation of to be economic on health	ons. nomically practicable and the environment;		
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	16. GENERATOR'S CERTIFICATION: I hereby declare that the contents packed, marked, and labeled, and are in all respects in proper condition if I am a large quantity generator, I certify that I have a program i economically practicable and that I have selected the practicable met threat to human health and the environment; OR, if I am a small quivaste management method that is available to me and that I can afford. Printed/Typed Name S. Rihtar	for transport by in place to red hod of treatme	highway act uce the volunt, storage, ir, I have m	cording to ume and or dispos	applicable i toxicity of v sal currently	nternatio vaste ge availabl	onal and national go nerated to the deg le to me which mini	rernmenta ree I have mizes the eneration	l regulations. e determined to be present and future
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3. Generator's Name and Mailing Address LTV STEEL CO. ENV. CONTROL DEP 3100 EAST 45th STREET CLEVELAND, OHIO 44127 4. Generator's Phone (216) 429-6370	τ:		<u>.</u> .		B. State	e Manifest Docum HD Nº e Generator's ID	<u>06</u>	4689
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	3. Generator's Name and Mailing Address LTV STEEL CO. ENV. CONTROL DEP 3100 EAST 45th STREET CLEVELAND, OHIO 44127 4. Generator's Phone (216) 429-6370	T. (1) (1) (1) (1) (1) (1) (1) (1) (1) (1)				0	HD NO te Generator's ID	ent Num	7714
	5. Transporter 1 Company Name DART TOUCKING CO	6. 0.H	US EPA ID I		8.2.5		te Transporter's ID	1-800	-541-8206
	7. Transporter 2 Company Name	8. 	US EPA ID I	Number			te Transporter's ID nsporter's Phone		
	9. Designated Facility Name and Site Address Envirosafe Services of Ohio	10.	US EPA ID I	Number			ite Facility's ID		
	876 Otter Creek Road Oregon, Ohio 43616	lo #	D. 0. 4. 5. 2	ე / ე -	7 0 6		ility's Phone	= 100	
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	16. GENERATOR'S CERTIFICATION: I hereby declare that the conte- packed, marked, and labeled, and are in all respects in proper condition. If I am a large quantity generator, I certify that I have a program	on for transport by	y highway acc	ording to	applicable i	internatio	onal and national go	vernmento	al regulations.
	economically practicable and that I have selected the practicable in threat to human health and the environment; OR, if I am a small waste management method that is available to me and that I can affor	nethod of treatme quantity generate	ent, storage.	or dispose	d currently	availab	le to me which min	mizes the	present and tuture
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	3. Generator's Name and Mailing Address LTV STEEL CO. ENV. CONTROL DEF 3100 EAST 45th STREET CLEVELAND, OHIO 44127 4. Generator's Phone (216) 429-6370			20			0	te Manifest Docu HD NG te Generator's ID	ment Nur	7716
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	3. Generator's Name and Mailing Address LTV STEEL CO. ENV. CONTROL DEPT. 3100 EAST 45th STREET	A. State Manifest Document Number OHD Nº 077728 B. State Generator's ID
	CLEVELAND, OHIO 44127 4. Generator's Phone (216) 429-6370 5. Transporter 1 Company Name 6. US EPA ID Number 6. If D99 70 2.10 29	C. State Transporter's ID D. Transporter's Phone 1 ~4/7 -63(-4/8)
	7. Transporter 2 Company Name 8. US EPA ID Number	E. State Transporter's ID F. Transporter's Phone
	9. Designated Facility Name and Site Address 10. US EPA ID Number Envirosafe Services of Ohio, Inc. 876 Otter Creek Road	G. State Facility's ID
	Oregon, Ohio 43616 O. H. D. O. 4. 5. 2. 4. 3. 7. 0. 6	
	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) 12. Cont No.	ainers 13. 14. Unit I. Type Quantity Wt/Vol Waste No.
	X RQ Hazardous Waste, Solid, N.O.S. ORM-E, NA 9189 (K141)	DT 42860 P K141
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	J. Additional Descriptions for Materials Listed Above Coal Tar → Contaminated Soil	K. Handling Codes for Wastes Listed Above
3.	15. Special Handling Instructions and Additional Information 11a. GSN 11637-012 24-Hr. Emergency Contact 419/691-0016	MAIL COMPLETED FORM TO: LTV STEEL ENVIRONMENTAL CONTROL DEPT. 3100 EAST 45th Street CLEVELAND. OHIO 44127
	16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately despacked, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable. If I am a large quantity generator, if certify that I have a program in place to reduce the volume and taxicity of economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith eff waste management method that is available to me and that I can afford.	nternational and national governmental regulations. vaste generated to the degree I have determined to be available to me which minimizes the present and future
Į,	Printed/Typed Name S. Rihtar Signature	105/04/93
TRANSPORTER	17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name CARL Russel 18. Transporter 2 Acknowledgement of Receipt of Materials	Month Day Year 05 0 4 9 3
RTE	Printed/Typed Name Signature	Month Day Year
FA	19. Discrepancy Indication Space	
Ĺ I T Y	20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except a	s noted in Item 19.
Ý	Printed/Typed Name JEFF HARDING Signature Hordun	Month Day Year S 14 193
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ÌÁ	3. Generator's Name and Mailing Address LTV STEEL CO. ENV. CONTROL DEF			•		0	te Manifest Docum HD Nº te Generator's ID	ent Num	7729
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	11. US DOT Description (Including Proper Shippin				No.	Type	13. Total Quantity	14. Unit Wt/Vol	l. Waste No.
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	16. GENERATOR'S CERTIFICATION: I hereby dec packed, marked, and labeled, and are in all respect if I am a large quantity generator, I certify that economically practicable and that I have selected threat to human health and the environment; OR waste management method that is available to me	ts in proper condition for tr I have a program in pla I the practicable method I, if I am a small quantity	ansport by highway acc ace to reduce the volu of treatment, storage,	ording to ap me and tox or disposal	plicable in sicity of w currently	iternatio aste ger availabli	nal and national governmented to the degree to me which minit	ernmenta ee I have nizes the	I regulations. determined to be present and future
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	7. Designated Facility Name and Site Address Envirosafe Services of Ohi			S EPA ID N			F. Tra	nsporter's Phone ste Facility's ID		
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	7. Transporter 2 Company Name			US EPA ID N		· · · · · ·	E. Sta	te Transporter's ID	 -	176 5/1
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A	 Generator's Name and Mailing Address LTV STEEL CO. ENV. CONTROL E 3100 EAST 45th STREET CLEVELAND, OHIO 44127 Generator's Phone (216) 429-6370 	EPT	e e e e e e e e e e e e e e e e e e e	·	0	HD Nº	ent Numl	7736								
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	16. GENERATOR'S CERTIFICATION: 1 hereby packed, marked, and labeled, and are in all res	declare that the contents of this consi	gnment are fully and a	ccurately des	cribed ab	ove by proper shipp	ing name	and are classified,								
	If I am a large quantity generator, I certify economically practicable and that I have selethreat to human health and the environment; waste management method that is available to	hat I have a program in place to ted the practicable method of treat OR, if I am a small quantity gener	reduce the volume and ment, storage, or dispo	l toxicity of v	vaste gen available	erated to the degr to me which minir	ee I have nizes the	r determined to be present and future								
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5. Transporter 1 Company Name	00177 F6, /WOHD.	US EPA ID Number 9 8 7 A 2 J	029		Transporter's ID	19/8	36-6187
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11a. GSN 11637-012	1/6.	65N 116	3 7-O	E	TV STEEL NVIRONMENT		TROL DEPT.
24-Hr. Emergency Contact				. (100 EAST 45tl CLEVELAND, C	HIO 441	
16. GENERATOR'S CERTIFICATION: I hereby of pocked, marked, and labeled, and are in all res	sects in proper condition for franspoi	u bà uiguwaà accetania	10 obbacciona	Hilleringhold	or otto transmer Be-		- • -
If I am a large quantity generator, I certify t	hat I have a program in place to	reduce the volume an	ed toxicity of	waste gen available	erated to the deg to me which mini	ree I have mizes the p	determined to be iresent and future
economically practicable and that I have select threat to human health and the environment; waste management method that is available to n	OR, if I am a small quantity gene	erator, I have made a	good faith ef	fort to mir	nimize my waste g	eneration a	nd select the best
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FEDERAL / OHIO LAND DISPOSAL RESTRICTION NOTIFICAT	TON AND CERTIFICATION FORM
GENERATOR NAME LTV STEEL CO.	GSN 11637-016
USEPA I.D. NOOHD 004218673 Marifes	t Doc. No. 077739
WASTE DESCRIPTION KO62-CONTAMINATED DEBUS EPARTY	K062
\$288.2 Category: E DANON-WASTEWATER F WASTEWATER G Subdivision:	
Treatment Standard Retta): X X 40 CFR 268.41(a) (TCLP) Y 40 CFR 268.42(a) (TECH OAC 3745-59-41-A OAC 3745-59-42-A	2 () 40 CFR 288,43(a) (CONC) OAC 3745-59-43-A
The generator named above hereby provides the following NOTIFICATION as required by a	IO CFR 268.7 / OAC 3745-59-07 that the waste material being
shipped under the above Manifest Dodument Number is subject to land disposal restrictions: A[] § 268.7(a)(1) / OAC 3745-59-07-A-1: The waste does not meet the applicable treatment of the subject to land the applicable treatment of the subject to land the subject to	nent standards in 40 CFR 268 Subpart D / OAC 3745-59 and/or
exceeds the applicable prohibition levels in 40 CFR 268.32 / OAC 3745-59-32 or RC standards referenced above or on the attached sheet.	PA § 3004(d) and may not be land disposed until it meets the
Bi 1 6 268.7(2)(2) / OAC 3745-59-07-A-2: The waste meets the applicable treatment at	andards in 40 CFR 268 Subpart D / OAC 3745-59 and/or the
applicable prohibition levels in 40 CFR 268.32 / OAC 3745-59-32 or RCRA § 3004(treatment.	d) [California List] and may be land disposed without additional
C X 6 268.7(a)(3) / OAC 3745-59-07-A-3: The waste is subject to a 6 268 granted petition.	§ 258.5 / OAC 3745-59-05 exemption, a § 268.6 / OAC 3745-59-
06 extension or a Nationwide Variance under 40 CFR 268, Subpart C or Variance under without additional treatment. The waste would otherwise be subject to the treatment at	anciards referenced above or on the attached sheet four 40 CED
268 Subpart D / OAC 3745-59 and/or 40 CFR 268.32 / OAC 3745-59-32 or RCRA 5 : Variance will remain in effect until the date indicated in the following Notification.	3004(d) [California List]). The Petition, Exemption, Extension or
The generator named above hereby provides the following NOTIFICATION and/or CERTII	FICATION as required by 40 CFR 268 / QAC 3745-59 that is
applicable to the waste material being shipped under the above Manifest Document Number; 1 This waste is exempt from land disposal restrictions per 40 CFR 268.36 (b) until June 3	0. 1993 (8268-36 ma.vaar Varianna nouty listed FR37-38 woote)
2 1 This waste is exempt from land disposal restrictions per 40 CFR 268.36 (c) or (e) until J	une 30, 1994 [6268.36 two-year Variance for newly Ested wastel —
This waste is defined as debris in 55 FR 22650 and is subject to a National case-by-ca- exempt from land disposal restriction treatment standards in 40 CFR 268.41 through 26	se extension of the effective date of regulation and is therefore 8.43 per 40 CFR 268 35/e) until May 8. 1993. In order to receive
The Denenii of this extension. I am required to place certain records in the Cocratino R	lecord of the facility denerating for treating) the waste by July 8
1992 or at the time the waste is generated, whichever is later. These records must incl how it will be stored and a schedule describing how adequate treatment capacity will	ude a written plan describing how debris wasts will be managed, be obtained. The plan must be certified as required by 40 CFR
268.5(b)/OAC 3745-59-05. [Debris National Extension of Effective Date] 4[] This waste is exempt from land disposal restrictions per 40 CFR 268.1 (c)(1) / OAC	•
[40 CPH 268.5/UAC 3745-59-05 Examplion of 268.6/3745-59-06	Extension; -
pursuant to 40 Chr. 268.44 / OAC 3745-59-44 [Alternate treatment standards Petition]	applicable alternate standards established in a petition granted
6 This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.4	5. [§268.7(a)(1)(iv) or 268.7(a)(3)(v) Debris, <u>list contaminants</u>]
7 I certify under penalty of law that the debris has been treated in accordance with the significant penalties for submitting a false certification, including the possibility of fine an	e requirements of 40 CFR 268,45. I am aware that there are to important mark mint
§ [] § 268.7(b)(5)(iii): I certify under penalty of law that I have personally examined and am fe	amiliar with the treatment technology and one ation of the
treatment process used to support this certification and that, based on my inquiry of information, I believe that the nonwastewater organic constituents have been treated by	y indinetation in units operated in accordance with 40 CFR Part
204, SUDDAR O, OF DV 40 CFH part 200, Subpart D, or by combustion in fuel substi	build units operating in accordance with populcable technical
requirements, and I have been unable to detect the nonwastewater organic constituent constituents. I am aware that there are significant penalties for submitting a false of	s despite naving used best good ratin efforts to analyze for such prification, including the possibility of fine and imprisonment.
[Detection limit alternative for NWW with 40 CFR 268.43 treatment standards] 10 [] § 268.7(a)(2)(ii): I certify under penalty of law that I personally have examined and am	•
KNOWIECIDE OF ING Waste to support this certification that the waste complies with the tree	itment standards specified in 40 CFR Part 268 Subpart D and 48
applicable prohibitions set forth in 40 CFR 268.32 or RCPA section 3004(d). I beliave t am aware that there are significant penalties for submitting a false certification, including	d the possibility of a fina and imprisonment
OAC-3745-59-07-A-2-(b): I certify under penalty of law that I personally have examined through knowledge of the waste to support this certification that the waste complies with	I and am familiar with the waste through analysis and testing or the treatment standards specified in rules 3745, 59,40 to 3745.
59-44 of the Administrative Code and all applicable prohibitions set forth in rule 3745.	-59-32 of the Administrative Code or section RCRA 9004/d) 1
believe that the information I submitted is true, accurate and complete. I am aware that including the possibility of a fine and imprisonment. [Meets California and §268 Subpan	t D I DR standards in neesent form without additional treatment
11 [§ 268.7(b)(5)(i): I certify under penalty of law that I have personally examined and a treatment process used to support this certification and that, based on my inquiry of	im familiar with the treatment technology and operation of the
information, I believe that the treatment process has been operated and maintained pro-	Oath an again second with the conformation love is specified in An
GFR Part 268, Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 prohibited waste. I am aware that there are significant penalties for submitting a false of the set of t	attification. Including the possibility of fine and imprisonment.
ONU 3/40-35-U/-E-3-(B): I Certify under penalty of law that I have personally examined	and am familiar with the treatment technology and operation of
the treatment process used to support this certification and that, based on my inquiry information, I believe that the treatment process has been operated and maintained or	operly so as to comply with the performance levels specified in
rules 3745-59-40 to 3745-59-44 of the Administrative Code and all applicable prohibit RCRA section 3004(d) without dilution of the prohibited wasts. I am aware that the	re are significant consistes for submitting a false certification
uncluding the possibility of the and imprisonment, if realment has been performed: wasi	te meals Calif. and \$268 Subpart D. standards:TCI Plot CONCI
12 [] § 268.7(b)(5)(ii): I certify under penalty of law that the waste has been treated in according there are significant penalties for submitting a false certification, including the possibility	' Of fine and imprisonment. Mark Apolicable Standard Relow:
DI IDEACT OF LINCIN OF LESUES OF LEMERC OF LIMERC OF LIGHT	VI IRTHRW WI I BORGS I I
OAC 3745-59-07-B-5-(b): I certify under penalty of law that the waste has been treated Administrative Code. I am aware that there are significant penalties for submitti	AC & 18146 CONTRICATION INCluding the enscibility of fine and
13 [] \$268.7(a)(7): I certify under penalty of law that I have personally examined and am far	m [] EXTRACT in [] DESTRUCT
Precise in Appendix 14 to part 200 or 10th was the first stiplect to recipling on 10th 4th C	FR 09tt 261. I am aware that there are significant negatives for
submitting a false certification, including the possibility of fine or imprisonment. [Organo 14 [] \$255.7(a)(8): I certify under penalty of law that I have personally examined and arm to the content of the content o	amiliar with the waste through soctule and tooken or through
knowledge of the waste and that the lab pack contains only organic waste specified in a under 40 CFR part 261. I am aware that there are significant penalties for submitted to the laboratory of the laboratory o	BRIDERITY V IN 1997 258 At third was be not a blood to considerate
imprisonment. [Organic labpack]	
Singara A. Rihta	C-1-97

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	_	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's U			Manifest Document N	2. Po			shaded areas is ederal law.
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		Transporter I Company Name	<i>t</i>	6.	US EPA ID I			ate Transporter's I	D .	
$\ \cdot\ $		Transporter 2 Company Name:	ties. fac.	<u> 0.H.D.</u>				ansporter's Phone		3%-6187
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		Oregon, Ohio 43616		OHD	0 4 5	2 4 3 7 0		cility's Phone 419/255	-5100	
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	3. Generator's Name and Mailing Address LTV STEEL CO. ENV. CONTROL D 3100 EAST 45th STREET CLEVELAND, OHIO 44127 4. Generator's Phone (216) 429-6370	EPT:			0	Manifest Docum	077	742
	5. Transporter 1 Company Name Buffalo Fyel Care	» W.V.	US EPA ID Numbe D. 0.5.1.80.			e Transporter's ID	716) 7	773-1921
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3. Generator's Name and Mailing Address LTV STEEL CO. ENV. CONTROL DEF 3100 EAST 45th STREET CLEVELAND, OHIO 44127 4. Generator's Phone (216) 429-6370			V.	A. Sta O B. Sta	te Manifest Pocum HD Nº te Generator's ID	07	7744
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3. Generator's Name and Mailing Address LTV STEEL CO. ENV. CONTROL DEPT 3100 EAST 45th STREET CLEVELAND, OHIO 44127 4. Generator's Phone (216) 429-6370					<u> </u>	HD NO te Generator's ID	07'	7745
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11a. GSN 11637-012 24-Hr. Emergency Contact 4	19/691-0016	33 101		452	グロ	LTV STEEL ENVIRONMENT 3100 EAST 45th CLEVELAND, C	i Street	
16. GENERATOR'S CERTIFICATION: I hereby decked packed, marked, and labeled, and are in all respects	are that the contents of this of	consignment are fu	ally and acc	curately des	ribed al	bove by proper shipp	ing name	and are classified,
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4	3. G	Generator's Name and Mailing Address LTV STEEL CO. ENV. CONTROL DEPT.	χ ²			A. Sta	te Manifest Docum	nent Num	7747
	4. G	3100 EAST 45th STREET CLEVELAND, OHIO 44127 Senerator's Phone (216) 429-6370				B. Sta	te Generator's ID	. : . :	1. 分類的表示。 2. 分類的表示。 数例表示的
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		24-Hr. Emergency Contact 419/691-0016		<i>{47</i>			CLEVELAND.	OHIO 4	1127
		GENERATOR'S CERTIFICATION: 1 hereby declare that the contents of the packed, marked, and labeled, and are in all respects in proper condition for tr	ansport by highway ac	cording to	applicable	internati	onal and national go	vernmento	l regulations.
		If I am a large quantity generator, I certify that I have a program in ple economically practicable and that I have selected the practicable method threat to human health and the environment; OR, if I am a small quantity	of treatment, storage,	, or dispo	sal currently	availab	le to me which min	imizes the	present and future
		waste management method that is available to me and that I can afford. Printed/Typed Name S. Rihtar	Signature	1	()) 、	1.1	. ^	onth Day Yea
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	3. Generator's Name and Mailing Address LTV STEEL CO. ENV. CONTROL DO 3100 EAST 45th STREET CLEVELAND, OHIO 44127 4. Generator's Phone (216) 429-6370	EPT.		•		O	te Manifest Pocur HD Nº te Generator's ID	O7	7748 ***********************************
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BUFFAL O FUEL CORP INY DOS. 18.0.9.952 D. Transporter's Phone ILG 773-172 7. Transporter 2 Company Name 8. US EPA ID Number 9. Designated Facility Name and Site Address Envirosafe Services of Ohio, Inc. 876 Otter Creek Road Oregon, Ohio 43616 [O.H.D. 0.4.5.2.4.3.7.0.6] 11. US DOT Description (Including Proper Shipping Name. Hazard Class. and ID Number) 12. Containers 13. I.d. Unit Wilve Waste Na. No. Type Quantity Wilve Waste Na. RQ Hazardous Waste, Solid, N.O.S. ORM-E, NA 9189 (K141) Additional Descriptions for Materials listed Above Coal Tar - Contaminated Soil TAL . Dole Solid Handling Instructions and Additional Information 11a. GSN 11637-012 24-Hr. Emergency Contact 419/691-0016 3. US EPA ID Number E. State Fransporter's Phone E. State Facility's ID F. Transporter's Phone C. State Facility's ID F. Transporter's Phone C. State Facility's ID F. Transporter's Phone C. State Facility's ID F. Transporter's Phone C. State Facility's ID F. Transporter's Phone C. State Facility's ID F. Transporter's Phone C. State Facility's ID F. Transporter's Phone C. State Facility's ID F. Transporter's Phone C. State Facility's ID F. Transporter's Phone C. State Facility's ID F. Transporter's Phone C. State Facility's Phone C. State Facility's Phone C. State Facility's Phone A 19/255-5100 A 19/255-5100 Total Will A 10 Ind Hall Containers Total Will A 10 Ind Will Worste Name Additional Descriptions for Materials Listed Above Coal Tar - Contaminated Soil TAL . Dole State Listed Above MAIL COMPLETED FORM TO: ENVIRONMENTAL CONTROL DEP 3100 EAST 45th Street CLEVELAND, OHIO 44127
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24-Hr. Emergency Contact 419/691-0016 3.14 CLEVELAND, OHIO 44127
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classifi
packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and fut threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the I waste management method that is available to me and that I can afford.
Printed/Typed Name S. Rihtar Signature A. D. J. T. Month Day 1
A Printed/Typed Name Signature Signature Month Day Peter H, M=Clusky 0.50.49
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day
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	economically practicable and that I have selected the practice threat to human health and the environment; OR, if I am a swaste management method that is available to me and that I can	able method of treatment, stor small quantity generator, I hav	age, or dispo	osal currently	available (e to me which mir	nimizes the	present and tuture
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	threat to human health and the environment; OR, waste management method that is available to me an	if I am a small quantity	generator, i have	ade a good faith	effort to mini	imize my waste g	eneration	and select the best
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	3. Generator's Name and Mailing Address LTV STEEL CO. ENV. CONTROL DO 3100 EAST 45th STREET CLEVELAND, OHIO 44127 4. Generator's Phone (216) 429-6370	EPT.	US EPA ID N		B. Sto	the Manifest Document of the Manifest Document	07	7758
	5. Transporter 1 Company Name BEQNET Truck, my 7. Transporter 2 Company Name	Inc, 6.1	1. 0.0.4.9 .3 US EPA ID I		.3 D. Tr	ansporter's Phone	1800	- 3469634
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r	 Designated Facility Name and Site Address Envirosafe Services of C 876 Otter Creek Road)hio, Inc.	US EPA ID I	Number		ate Facility's ID		
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	15. Special Handling Instructions and Additional	Information ICD I	#21	'	L	MAIL COMPLE	TED FC	ORM TO:
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	7.	Transporter 2 Company Name		<u> </u>	F. Transpor	ter's Phone	
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		if I am a large quantity generator, I certify that I have a program economically practicable and that I have selected the practicable me threat to human health and the environment; OR, if I am a small q waste management method that is available to me and that I can afford	vantity generator, I have n	or disposal current	ly available to iffort to minimi	me which minimizes th ze my waste generation	e present and future n and select the best
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	 Generator's Name and Mailing Address LTV STEEL CO. ENV. CONTROL DEP 3100 EAST 45th STREET 	ग.	s _1				0	HD NO	nent Num 07	7772
	CLEVELAND, OHIO 44127 4. Generator's Phone (216) 429-6370 5. Transporter 1 Company Name	<u> </u>		S EPA ID N				ite Generator's ID		State of the second of the sec
	BERNET Trucking I	vc,	6.H.O.O	49.	3.7.1	693	D. Tro	ate Transporter's II ansporter's Phone	-900-	346.9634
	7. Transporter 2 Company Name		8. U	S EPA ID N	· · ·	· ·	<u> </u>	ite Transporter's IE insporter's Phone)	- 1 July 3 A F
	 Designated Facility Name and Site Address Envirosafe Services of Oh 876 Otter Creek Road 	io, Inc.	10. U	S EPA ID N	łumber			ate Facility's ID		
	Oregon, Ohio 43616		O. H. D. O	. 4. 5. 2	2,4.3.	7.0.6		cility's Phone 419/255-	5100	
	11. US DOT Description (Including Proper Shippin	g Name, Hazard Cl	lass, and ID Num	nber)		12. Cont No.	ainers Type	13. Total Quantity	14. Unit Wt/Vol	l. Waste No.
	a X RQ Hazardous Waste, ORM-E, NA 9189 (K	Solid, N. 141)	0.S.			001	DΤ	46.000	P	K141
- GEZ#	b.									
Ř A T O	c.			. ".						
	d.			<u> </u>		• •	•			e de la constantina del constantina de la constantina del constantina
	J. Additional Descriptions for Materials Listed Abo Coal Tar - Contaminated S 15. Special Handling Instructions and Additional	oil					K. Ha	ndling Codes for N	F	
	11a. GSN 11637-012 24-Hr. Emergency Contact	:	16		40	5-24)		MAIL COMPLE LTV STEEL ENVIRONMENT 3100 EAST 45t CLEVELAND, C	AL CO	NTROL DEPT.
	16. GENERATOR'S CERTIFICATION: I hereby declipacked, marked, and labeled, and are in all respect If I am a large quantity generator, I certify that economically practicable and that I have selected threat to human health and the environment; OR, waste management method that is available to me a	s in proper condition I have a program i the practicable met if I am a small qu	for transport by h in place to reduction had of treatment	ighway acc to the volu t. storage.	y and accu ording to a me and to or disposa	prately descripplicable in exicity of well currently	ribed ab iternatio aste ger available	nove by proper shipp nal and national governmented to the degr	sing name rernmental ree I have	and are classified, regulations. determined to be present and future
1	Printed/Typed Name S. Rihtar		Signat	ure	§	Kis	(£	ar so	M.	onth Day Year
-R4Z0POR-UR	17. Transporter 1 Acknowledgement of Receipt of Printer Typed Name VIVIM E BRADOU 18. Transporter 2 Acknowledgement of Receipt of	BERRY	Signat	Mon	, 8.	Br	md	ylang	, W	onth Day Year 6 10 2 19 3
RTER	Printed/Typed Name		Signat	ure			_/		Me I	onth Day Year
FAC-	19. Discrepancy Indication Space						M.		. <u></u>	· : ·
- L- L- Y	20. Facility Owner or Operator: Certification of re-	ceipt of hazardous			manifest	except as	noted i	n Item 19.		
	Printed/Typed dame	ran	Signat	Da	l	m	<i>t</i>	the	Pi Pi	C 0.7.83
	Management (a. 1988) pro-	ORIGINAL	— RETURN	I TO GE	NERAT	OH) Or	and the second			

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	-71 - 55	UNIFORM HAZARDOUS	or's US EPA ID No. 0 0 4 2.1.8	. 6 . 7 . 3	Docum	inifest nent No. 7 . 7 . 3	2. Pag			shaded are deral law.	as is
	4 . 5 .	Generator's Name and Mailing Address LTV STEEL CO. ENV. CONTROL DEPT. 3100 EAST 45th STREET CLEVELAND, OHIO 44127 Generator's Phone (216) 429-6370 Transporter 1 Company Name BECNER Trucking Lnc	6. 10 H.O.	JS EPA ID		6.9.3	B. Sta	te Manifest Posum HD Nº te Generator's ID te Transporter's ID nsporter's Phone	07	7773	34
		Transporter 2 Company Name	8. I	JS EPA ID	Number		E. Sta	te Transporter's ID			
	9.	Designated Facility Name and Site Address Envirosafe Services of Ohio, Inc.		US EPA ID	Number			nsporter's Phone ate Facility's ID			- -
		876 Otter Creek Road Oregon, Ohio 43616	O. H. D. (D. 4. 5.	2. 4. 3	7.0.6	ì	cility's Phone 419/255—	5100		4
	11	US DOT Description (Including Proper Shipping Name, Hazar HM	rd Class, and ID No	ımber)		12. Cont	ainers Type	13. Total Quantity	14. Unit Wt/Vol	l. Waste N	lo.
	a.	X RQ Hazardous Waste, Solid, ORM-E, NA 9189 (K141)	N.O.S.			001	DΤ	EST 47.000	P	K141	
GENER	b.				-						1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
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		Additional Descriptions for Materials Listed Above Coal Tar - Contaminated Soil			, 1899	ar unt	K. Ho	ndling Codes for V	<u>- G</u> (18 C	
	15	 Special Handling Instructions and Additional Information 11a. GSN 11637-012 24-Hr. Emergency Contact 419/691 	_	- ± 3/ ∂) HE	542 1-	0	MAIL COMPLE LTV STEEL ENVIRONMENT 3100 EAST 45t CLEVELAND. (AL CC	ONTROL DI	EPT.
	16	6. GENERATOR'S CERTIFICATION: I hereby declare that the copacked, marked, and labeled, and are in all respects in proper conif I am a large quantity generator, I certify that I have a professional practicable and that I have selected the practicable threat to human health and the environment; OR, if I am a smewaste management method that is available to me and that I can a	idition for transport b gram in place to re le method of treatm iall quantity generat	y highway a duce the vo ent, storage	iccording to olume and e, or dispos	opplicable in toxicity of visal currently	internatio vaste ge availab	onal and national government of the degree to me which mini	remmento ree I hav mizes the	il regulations. e determined present and	to be future
		Printed/Typed Name S. Rihtar	Sign	nature /	<u> </u>	Ri	h	tarpo	_	onth Day 0-6 0-3	Year 193
TRANSPORTER		7. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name	Sign	nature	Pob.	L	Bes	2	k	10nth Day	۲۰۰۰ 2:7
Ģ	11	8. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name	Sign	nature					٨	tonth Day	Year
F	_	19. Discrepancy Indication Space									<u>·</u>
	II.	20. Facility Owner or Operator: Certification of receipt of haza	ardous materials co	veled by t	his manife	est except o	is noted	in Item 19.			
Ĺ		Printed/Typed Name JEFF HAM		nature	He				,	onth Day	14 <u>3</u>
		ORIG	INAL RETU	BN 10 6	ENERA'	UH Tor			111	7.0	

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	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's U		Manifest	2. Page			shaded areas is ederal law.
1	3. Generator's Name and Mailing Address LTV STEEL CO. ENV. CONTROL DE 3100 EAST 45th STREET CLEVELAND, OHIO 44127			×	A. State	Manifest Document No.	07	7774
	5 Transporter I Company Name		6. US EPA ID I	Number	C. State	Transporter's ID	,)	e e e e e e e e e e e e e e e e e e e
	DERNER TRUCK, N.	ig Luc	b.H.D.049.	37169	D. Tran	sporter's Phone		
	7. Iransporter 2 Company Name		8. US EPA ID I	- dumber		Transporter's ID sporter's Phone		211-9/2/1
	9. Designated Facility Name and Site Address Envirosafe Services of 0		10. US EPA ID N	lumber		e Facility's ID	000	75 - 163 - 1
П	876 Otter Creek Road Oregon, Ohio 43616		Q H D O 4 5,	2 4 3 7 (ity's Phone 419/255~	5100	
	11. US DOT Description (Including Proper Shippi	ing Name, Hazard Cla			Containers	13. Total	14. Unit	l. Waste No.
	RQ Hazardous Waste ORM-E, NA 9189 (, Solid, N.(K141)	0.S.	00	1 DT .	Quantity EST 16000	Wt/Vol	K141
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	J. Additional Descriptions for Materials Listed Ab	· · · · · · · · · · · · · · · · · · ·						
	Coal Tar - Contaminated 15. Special Handling Instructions and Additional			15 15	Æ	lling Codes for V		
	11a. GSN 11637-012 24-Hr. Emergency Contact	419/691-003		4644 T	C	MAIL COMPLE TV STEEL NVRONMENT 100 EAST 4511 LEVELAND, C	AL CON Street HIO 44	NTROL DEPT.
	16. GENERATOR'S CERTIFICATION: 1 hereby de- packed, marked, and labeled, and are in all respe- if 1 am a large quantity generator, 1 certify that economically practicable and that 1 have selected threat to human health and the environment; Of waste management method that is available to me	cts in proper condition to t I have a program in t the practicable metho t, if I am a small qua	or transport by highway acc n place to reduce the volu od of treatment, storage,	ording to applical me and toxicity : padisposal curre	ble internationa of waste gener other available t	l and national government to the degree	ernmental ea have	regulations.
۲	Printed/Typed Name S. Rihta	r	Signature). K	ift	ar an	Mo IO	nth Day Year
T R	17. Transporter 1 Acknowledgement of Receipt of Printed/Typed Name	f Materials						<u> </u>
TRANSPORTER	18. Transporter 2 Acknowledgement of Receipt o		Signature	nWi	inde	le	Mo O	
K T E R	Printed/Typed Name		Signature				Mo-	nth Day Year
	19. Discrepancy Indication Space			-				
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I T Y	20. Facility Owner or Operator: Certification of re	eceipt of hazardous n		manifest excep	t as noted is I	tem 19.		
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AND SECTION OF THE SE		$N_{\dot{0}}$	07777	5		TOTAL STREET	
UNIFORM HAZARDOUS	1. Generator's US EPA ID No O H D 0 0 4 2. 1.	8.6.7.3	Manifest Document No 7, 7, 7, 7	. SI OT	not require	in the shaded d by Federal lav	areas is . V.
WASTE MANIFEST 3. Generator's Name and Mariling Address	O H D 0 0 4 2. 1.	8.0.1.5	1 1 1 1 1 1	A. State	Manifest Posume	nt Number -	5
LTV STEEL CO. ENV. CONTROL DE	PT.			B. State	Generator's ID	0111	
3100 EAST 45th STREET CLEVELAND, OHIO 44127 4. Generator's Phone (216) 429-6370				6 64-4	Transporter's ID		
Towns 1 Company Name	T . 6.	US EPA ID N .0.4.9.		3 D. Tran	sporter's Phone	100-346-	9634
REWER Trucking. 7. Transporter 2 Company Name	1 Ν ς , <u>Θ Α . Ρ</u> . 8.	US EPA ID	lumber		Transporter's ID sporter's Phone		•
·	10.	US EPA ID I	· · · ·		re Facility's ID		
9. Designated Facility Name and Site Address Envirosafe Services of				LI Fac	ility's Phone		
876 Otter Creek Road		0.45	2. 4. 3. 7.		419/255-		+ 2
Oregon, Ohio 43616 11. US DOT Description (Including Proper Ship)			12.	Containers	13. Total Quantity	14. Unit Wt/Vol Wa	I. ste No.
ihmi		· ·	N	o. Type	£5T		1 2 t
a. X RQ Hazardous Wast	e, Solid, N.O.S. (K141)		0	01 DT	30.000	PK	141
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J. Additional Descriptions for Materials Listed	1 Above			к. н	andling Codes for	Wastes Listed A	bove
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11a. GSN 11637-012					1100 FAST 4	NTAL CONTR 5th Street	OL DEPI
24-Hr. Emergency Conta	act 419/691-0016	160			1 1	OHIO 44127	are classifie
16. GENERATOR'S CERTIFICATION: I here packed, marked, and labeled, and are in all if I am a large quantity generator, I certieconomically practicable and the analyzone.	by declare that the contents of this of respects in proper condition for transfy that I have a program in place elected the practicable method of the Post of the Post of the practicable method of the Post of th	to reduce the	volume and tox	icity of waste	generated to the G	generation and	ent and futu select the b
waste management method that is available		Signature	A	RIKT	LAK OR	Month D 6	17579
5. KI			<u> </u>				
17. Transporter 1 Acknowledgement of Recomplete Printed/Typed Name 18. Transporter 2 Acknowledgement of Recomplete Printed/Typed Name Recomplete Printed/Typed Name	OUB ERRY	Signature	Cion E	Mane	hypory		11.518
18. Transporter 2 Acknowledgement of Rec	eign of Materials	Signature			/	Month	Day
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19. Discrepancy Indication Space							
F A C							
	ion of receipt of hazardous mate	erials covered	by this manifes	except as ac	red to item 19		
20. Facility Owner of Operator. Certification of Printed/Typed Name COO	1 12/2	Signature	1.	1		Mon	~/3f
Printed/ Typed Tallie LKK	7 TICKLE		\	ALL		TOTAL	
700-27 (lor: 946) Terrible 4 (85)	original —	DETIIDM T	n GENERAI		Troft & Soft St		
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			No	97777	7				
	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA Q H D 0 Q 4.2		Manifest Document N	2. Pag			shaded areas is deral law.	
1	3. Generator's Name and Mailing Address LTV STEEL CO. ENV. CONTROL DEPT. 3100 EAST 45th STREET CLEVELAND, OHIO 44127 4. Generator's Phone (216) 429-6370				A. Sta	te Manifest Pocur HD NG te Generator's ID	nent-Num 07	7777	
	5. Transporter 1 Company Name CHEM TVEIQHT	\$ H	US EPA ID I	Number		ite Transporter's 10		8G- 10 0/	
	. Transporter 2 Company Name		-8. US EPA ID Number			E. State Transporter's ID F. Transporter's Phone			
	9. Designated Facility Name and Site Address Envirosafe Services of C	hio, Inc.	10. US EPA ID Number			ste Facility's ID			
	876 Otter Creek Road Oregon, Ohio 43616	[0, E	I, D, O, 4, 5,	2,4,3,7,0		cility's Phone 419/255–	5100	e gerale Service	
	11. US DOT Description (Including Proper Shipp	ing Name, Hazard Class, an	d ID Number)	12. C	Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	
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J. Additional Descriptions for Materials Listed Above Coal Tar - Contaminated Soil: Science:								Above	
	15. Special Handling Instructions and Additional Information 11a. GSN 11637-012 24-Hr. Emergency Contact 419/691-0016 AMAIL COMPLETED FORM TO: LTV STEEL ENVIRONMENTAL CONTROL DEPT. 3100 EAST 45th Street CLEVELAND. OHIO 44127								
	16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.								
٧	Printed/Typed Name S. Rihta	ır	Signature	, Ri	Kta	4.0B	M	onth Day Year 0.611.619.3	
TRA	17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Signature Month Day Year								
AZSPORFER	Jeffney R CLyBur 18. Transporter 2 Actnowledgement of Receipt	N S C.	Jeffrey	* C4/	الخوسين	و 	K	261/6193	
E R	Printed/Typed Name		Signature			•	- M	onth Day Year	
F A Ç	19. Discrepancy Indication Space								
Î	20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.								
2.26	Printed Typed Name Mer	Ther	Signosure	<u>l</u>	1	t	ے ا	001 Doy 1395	
	ORIGINAL — RETURN TO GENERATOR								